

**San Francisco Public Utilities Commission**  
**Peninsula Pipelines Seismic Upgrade Project**  
San Mateo County, California

**Responses to Comments on**  
**Draft Environmental Impact Report**

September 2013



*Prepared for:*

**San Francisco Planning Department, Environmental Planning Division**

**San Francisco Planning Department Case No. 2011.0123E**

**State Clearinghouse No. 2011112028**

DEIR Publication Date: March 13, 2013

DEIR Public Hearing Dates: April 16, 2013, San Bruno, CA and April 18, 2013, San Francisco, CA

DEIR Public Comment Period: March 14, 2013 to April 29, 2013

Final EIR Certification Hearing Date: October 17, 2013

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# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** September 27, 2013

**TO:** Members of the Planning Commission and Interested Parties

**FROM:** Sarah Jones, Environmental Review Officer

**Re:** **Attached Responses to Comments on Draft Environmental Impact Report Case No. 2011.0123E, Peninsula Pipelines Seismic Upgrade Project**

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Attached for your review, please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on October 17, 2013.** Please note that the public review period ended on April 29, 2013.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Comments and Responses document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Steven Smith, AICP, at (415) 558-6373.

Thank you for your interest in this project and your consideration of this matter.

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**San Francisco Public Utilities Commission**  
**Peninsula Pipelines Seismic Upgrade Project**  
San Mateo County, California

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**Responses to Comments on**  
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# TABLE OF CONTENTS

		Page
CHAPTER 1	INTRODUCTION .....	1-1
1.1	PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT .....	1-1
1.2	ENVIRONMENTAL REVIEW PROCESS.....	1-1
1.3	DOCUMENT ORGANIZATION .....	1-3
CHAPTER 2	LIST OF PERSONS COMMENTING .....	2-1
2.1	FEDERAL, STATE, REGIONAL, AND LOCAL AGENCIES, BOARDS, AND COMMISSIONS .....	2-1
2.2	ORGANIZATIONS.....	2-2
2.3	INDIVIDUALS .....	2-2
CHAPTER 3	COMMENTS AND RESPONSES.....	3-1
3.1	GENERAL COMMENTS .....	3-9
3.2	EXECUTIVE SUMMARY .....	3-17
3.3	INTRODUCTION AND BACKGROUND .....	3-30
3.4	PROJECT DESCRIPTION .....	3-31
3.5	OVERVIEW/CUMULATIVE PROJECTS.....	3-44
3.6	LAND USE AND LAND USE PLANNING.....	3-49
3.7	AESTHETICS.....	3-50
3.8	TRANSPORTATION AND CIRCULATION .....	3-51
3.9	NOISE .....	3-66
3.10	UTILITIES AND SERVICE SYSTEMS.....	3-71
3.11	BIOLOGICAL RESOURCES.....	3-74
3.12	GEOLOGY AND SOILS .....	3-77
3.13	HYDROLOGY AND WATER QUALITY .....	3-80
3.14	ALTERNATIVES.....	3-86
CHAPTER 4	DRAFT EIR REVISIONS .....	4-1
4.1	TEXT REVISIONS .....	4-1
4.1.1	Chapter 1, Executive Summary.....	4-1
4.1.2	Chapter 2, Introduction.....	4-8
4.1.3	Chapter 3, Project Description.....	4-8
4.1.4	Chapter 5, Environmental Setting, Impacts, and Mitigation Measures .....	4-13
4.2	FIGURE REVISIONS .....	4-27
CHAPTER 5	REFERENCES.....	5-1

**TABLES**

Table RTC 3-1	Comments on the Draft EIR .....	3-2
Table RTC 3-2	Summary of Improvement Measures for Proposed Project (Table 1-2) .....	3-24
Table RTC 3-3	Daytime Construction Hours By Type of Construction Activity .....	3-35
Table RTC 4-1	Summary of Improvement Measures for Proposed Project (Table 1-2) .....	4-7
Table RTC 4-2	Proposed Construction Staging Areas (Revised Table 3-4) .....	4-11

**FIGURES**

Figure RTC 4-1	Colma Site (Revised Figure 3-2).....	4-29
Figure RTC 4-2	South San Francisco Site (Revised Figure 3-3) .....	4-30
Figure RTC 4-3	San Bruno South Site (Revised Figure 3-5).....	4-31
Figure RTC 4-4	Colma Plan and Profile (Revised Figure 3-7).....	4-32
Figure RTC 4-5	South San Francisco Plan and Profile (Revised Figure 3-8) .....	4-33
Figure RTC 4-6	San Bruno South Plan and Profile (Revised Figure 3-10).....	4-34

**ATTACHMENTS**

Attachment A	Draft EIR Comment Letters and Emails
Attachment B	Draft EIR Hearing Transcripts



**ACRONYMS**

BAAQMD	Bay Area Air Quality Management District
BAWSCA	Bay Area Water Supply and Conservation Agency
bgs	below ground surface
BMP	best management practice
CEQA	California Environmental Quality Act
dBA	A-weighted decibel
EIR	Environmental Impact Report
HTWTP	Harry Tracy Water Treatment Plant
I-280	Interstate 280
L <sub>eq</sub>	equivalent continuous noise level
LOS	Level of Service
MMRP	Mitigation Monitoring and Reporting Program
NOP	Notice of Preparation
PG&E	Pacific Gas & Electric Company's
Planning Department	San Francisco Planning Department
PPSU	Peninsula Pipelines Seismic Upgrade
ROW	right-of-way
RTC	Responses to Comments
RWQCB	Regional Water Quality Control Board
SAPL2	San Andreas Pipeline No. 2
SAPL3	San Andreas Pipeline No. 3
SFPUC	San Francisco Public Utilities Commission
SSBPL	Sunset Supply Branch Pipeline
SWPPP	Storm Water Pollution Prevention Plan
UV	ultraviolet
WSIP	Water System Improvement Program

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# CHAPTER 1

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## Introduction

### 1.1 Purpose of the Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to respond in writing to the substantive comments received on the Draft Environmental Impact Report (EIR) for the proposed San Francisco Public Utilities Commission (SFPUC) Peninsula Pipelines Seismic Upgrade (PPSU) project. Pursuant to Section 15088 of the California Environmental Quality Act (CEQA) Guidelines, the San Francisco Planning Department (Planning Department) has considered both written and oral comments on environmental issues, and prepared written responses to those comments. The Planning Department received written comments during the public comment period from March 14, 2013, to April 29, 2013. Oral testimony was received at a public hearing held on the Draft EIR in the City of San Bruno at the San Bruno Chinese Church on April 16, 2013, and at a public hearing before the San Francisco Planning Commission held on the Draft EIR on April 18, 2013. Transcripts of the proceedings from the public hearings and written comments are included in their entirety in Attachments A and B.

The Draft EIR, together with this RTC document, will be considered by the Planning Commission at a noticed public hearing and, if deemed adequate with respect to accuracy, objectiveness, and completeness, will be certified as a Final EIR. The Final EIR will consist of the Draft EIR, the comments received during the public review period, responses to the comments, and any revisions to the Draft EIR that result from public agency and public comments, as well as staff-initiated text changes.

### 1.2 Environmental Review Process

As described in Section 2.4, Public Outreach, of the Draft EIR, in accordance with Sections 15063 and 15082 of the CEQA Guidelines, the Planning Department, as lead agency, initiated the environmental review process for the PPSU project with distribution of the Notice of Preparation (NOP) of an EIR, which solicited comments regarding the scope of the EIR for the proposed project. The NOP was placed in the Examiner (San Francisco, California) and in the San Mateo Times on November 9, 2011, and was posted to the Planning Department website along with other information related to the proposed project. The 30-day scoping period began on November 9, 2011, and ended on December 9, 2011. A public scoping meeting during the NOP public review period was held November 30, 2011, at the San Bruno Chinese Church, 250 Courtland Avenue, San Bruno, California.

The Planning Department prepared the Draft EIR for the PPSU project in accordance with CEQA, the CEQA Guidelines in Title 14 of the California Code of Regulations, and Chapter 31 of the San Francisco Administrative Code (Administrative Code).

The Draft EIR was published on March 13, 2013, and circulated to the public, other interested parties, agencies, nearby property owners, individuals likely to be interested in the potential impacts of the proposed project, people who submitted comments during the NOP public review comment period, and to those who requested a copy of the Draft EIR. Copies of the Draft EIR were available for public review during normal business hours at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, 94103. The Draft EIR was also sent to 11 libraries in San Francisco and the Peninsula, and posted for public review on the Planning Department's website (<http://www.sfplanning.org>).

The public comment period was then held from March 14, 2013, to April 29, 2013, to solicit public comment on the adequacy and accuracy of information presented in the Draft EIR. Two public hearings were held on the Draft EIR during the public comment period: one on April 16, 2013, in the City of San Bruno; and one on April 18, 2013, at a public hearing before the San Francisco Planning Commission. The comments received during the public review period and at the hearings are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR.

This RTC document has been distributed to the San Francisco Planning Commission and State Clearinghouse, as well as to the agencies, organizations, and individuals who commented on the Draft EIR. This RTC document, together with the Draft EIR, constitute the Final EIR for the PPSU project. The Planning Commission will review and consider the information presented in the Final EIR and, at a public hearing scheduled for October 17, 2013, will decide whether to certify that the Final EIR has been completed in compliance with CEQA. In the event the Planning Commission's certification decision is appealed, the San Francisco Board of Supervisors would hear and make a final determination on any such appeal. Upon certification of the Final EIR, the SFPUC will review and consider the Final EIR prior to making a decision regarding project approval. If the SFPUC approves the proposed project, it will adopt environmental findings and a Mitigation Monitoring and Reporting Program (MMRP) at the project decision hearing. The CEQA Guidelines (Section 15097) require preparation of an MMRP, which is designed to ensure that mitigation measures identified in the Final EIR to reduce or avoid the project's significant environmental effects are implemented.

If the SFPUC decides to approve a proposed project having significant effects that are not avoided or reduced to a less-than-significant level, a Statement of Overriding Considerations must be prepared to describe that any such unavoidable significant effects are acceptable due to overriding considerations, pursuant to CEQA Guidelines Section 15093. The benefits of the proposed project must be balanced against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. If an agency makes a Statement of Overriding Considerations, the statement must be included in the record of project approval.

## 1.3 Document Organization

This RTC document is organized into the following sections:

**Chapter 1: Introduction** – This chapter describes the purpose of the RTC document, provides a summary of the environmental review process through certification of the EIR, and describes the organization of the RTC document.

**Chapter 2: List of Persons Commenting** – This chapter presents a list of the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearings on the Draft EIR. Comments are organized by agency (federal, State, regional, and local), organizations, and individuals. The chapter identifies whether the comments were submitted in writing (letter, e-mail, or fax) and/or orally at the Draft EIR public hearings.

**Chapter 3: Comments and Responses** – This chapter contains responses to all substantive comments received on the Draft EIR, organized by topic in the order of topics presented in the Draft EIR (i.e., beginning with Chapter 1, Executive Summary, of the Draft EIR and ending with Chapter 7, Alternatives, of the Draft EIR).

Each comment has been coded by subject area and assigned a two-part comment number based on the environmental topic abbreviations listed below, and based on the order of presentation under each topic. Each response has been assigned a corresponding number. For example, the first comment pertaining to Alternatives is “Comment AL-1,” and the response to that comment is “Response AL-1.” The second comment and response regarding alternatives are “Comment AL-2,” and “Response AL-2,” respectively. The direct quotes from the respective comment letter and/or transcript pertaining to the comment are listed below the comment number, followed by the response.

The environmental subject area abbreviations are as follows:

General Comments (GC)	Transportation and Circulation (TR)
Executive Summary (ES)	Noise (NO)
Introduction and Background (IN)	Utilities and Service Systems (UT)
Project Description (PD)	Biological Resources (BI)
Overview/Cumulative Projects (CU)	Geology and Soils (GE)
Land Use and Land Use Planning (LU)	Hydrology and Water Quality (HY)
Aesthetics (AE)	Alternatives (AL)

The responses in many cases provide clarification of the EIR text, but some revisions to the Draft EIR text have been made in response to comments received. Double-underlined text is used to represent language added or modified in the Draft EIR; ~~strikethrough~~ is used to represent language deleted from the Draft EIR. Revised graphics are shown with the word “Revised” next to the figure number.

The subject matter of one topic may overlap with that of other topics, so the reader must occasionally refer to more than one group of comments and responses to review all the information on a given subject. Cross-references are provided where necessary.

The comment letters are presented in their entirety in Attachment A of this RTC document, and are grouped by agencies (A), organizations (B), and individuals (C). The hearing transcripts are presented in Attachment B of this RTC document.

**Chapter 4: Draft EIR Revisions** – This chapter presents text changes to the EIR that reflect both text changes made as a result of a response to a comment, as well as text changes identified by Planning Department staff to update, correct, or clarify the EIR text. Revisions to the Draft EIR text are shown as follows: double-underlined text is used to represent language added or modified in the Draft EIR; ~~strikethrough~~ is used to represent language deleted from the Draft EIR; and revised graphics are shown with the word “Revised” next to the figure number.

The changes have not resulted in significant new information with respect to the proposed project, including any new significant environmental impacts that cannot be mitigated to a less-than-significant level, or new mitigation measures that the project sponsor has declined to adopt. Therefore, recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 is not required. This RTC document will be incorporated into the Final EIR as a new chapter. The changes to the EIR’s text and figures identified in Chapter 3, Comments and Responses, which are compiled in Chapter 4, Draft EIR Revisions, will be incorporated into the Final EIR text. This RTC document, together with the Draft EIR, will constitute the Final EIR.

**Chapter 5: References** – This chapter includes the references for the RTC document.

**Attachments** – The attachments are as follows:

Attachment A. Comment Letters

Attachment B. Public Hearing Transcripts

## CHAPTER 2

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### List of Persons Commenting

This chapter contains a list of the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearings on the Draft Environmental Impact Report (EIR). The San Francisco Planning Department received comments on the Peninsula Pipelines Seismic Upgrade Project Draft EIR during the public comment period from March 14, 2013, to April 29, 2013. In addition, two public hearings on the Draft EIR were held as follows:

- April 16, 2013 (6:30 pm) – San Bruno Chinese Church, 250 Courtland Avenue, City of San Bruno; and
- April 18, 2013 (12:00 pm) – San Francisco Planning Commission, Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, San Francisco.

The comment letters are presented in their entirety in Attachment A of this Responses to Comments document, and the hearing transcripts are presented in Attachment B.

### 2.1 Federal, State, Regional, and Local Agencies, Boards, and Commissions

The following agencies provided comments on the Draft EIR:

- Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013
- Erik Alm, AICP, District Branch Chief, California Department of Transportation; letter, April 16, 2013
- Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013
- Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013
- Michael P. Laughlin, AICP, City Planner, Town of Colma; letter, April 29, 2013
- Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013

- Michael J. Antonini, Commissioner, San Francisco Planning Commission; public hearing transcript, April 18, 2013

## 2.2 Organizations

The following organizations provided comments on the Draft EIR:

- Shelter Creek Condominiums
  - Shelter Creek Condominiums Board of Directors; letter, April 26, 2013
  - Michael Allen, General Counsel, Shelter Creek Condominiums; public hearing transcript, April 16, 2013
- San Bruno Chinese Church
  - Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013
  - Anthony Cheung, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013
- Central Peninsula Church
  - Charlie Royce, Director of Administration for Central Peninsula Church; public hearing transcript, April 16, 2013

## 2.3 Individuals

The following individuals provided comments on the Draft EIR:

- Richard Baxter; letter, March 14, 2013
- Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013
- Steve Lawrence; email, March 29, 2013
- Clara R. Taylor; letter, April 16, 2013



# CHAPTER 3

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## Comments and Responses

This chapter provides the verbatim text of the substantive comments received on the Draft Environmental Impact Report (EIR), and the lead agency responses to those comments. This chapter is organized by environmental subject area, and follows the same order of topics presented in the Draft EIR (by chapter and section). General comments on the EIR or the proposed project are grouped together at the beginning of this chapter. The outline of the comments and responses is shown below, with the environmental subject area abbreviations indicated in parentheses:

3.1 General Comments (GC)	3.8 Transportation and Circulation (TR)
3.2 Executive Summary (ES)	3.9 Noise (NO)
3.3 Introduction and Background (IN)	3.10 Utilities and Service Systems (UT)
3.4 Project Description (PD)	3.11 Biological Resources (BI)
3.5 Overview/Cumulative Projects (CU)	3.12 Geology and Soils (GE)
3.6 Land Use and Land Use Planning (LU)	3.13 Hydrology and Water Quality (HY)
3.7 Aesthetics (AE)	3.14 Alternatives (AL)

Within each environmental topic, similar comments are grouped together beneath a heading that introduces the subject of the comments. Comments are transcribed verbatim and may contain grammatical or typographical errors. After each comment, the name of the commenter, their organization (if applicable), type of comment (letter, email, or public hearing transcript), and date of comment are shown in italics. Attachments A and B present the comment letters and hearing transcripts in their entirety, respectively. Each comment letter/email and transcript was assigned a correspondence code (A = agency; B = organization; C = individual; TR = transcript) and consecutive number for tracking purposes. Then the comments were delimited to show the corresponding environmental subject area code and number, which indicates where the reader can locate the responses to those comments in this chapter. Table RTC (Responses to Comments) 3-1 below lists each correspondence code, the commenter's name, and the delimited comments within the letter.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment(s) and to clarify or augment information in the Draft EIR, as appropriate. The responses may also include revisions or additions to the Draft EIR. Portions of the Draft EIR that have been revised are shown as indented text. New or revised text is double underlined; deleted material is shown in ~~striethrough~~. In cases where a comment addresses more than one topic, the response may provide a cross-reference to other comment responses. Response numbers correspond to the comment numbers; for example, the response to Comment LU-1 is referred to as Response LU-1.

**Table RTC 3-1  
Comments on the Draft EIR**

<b>Letter Code</b>	<b>Full Name</b>	<b>Comment Type</b>	<b>Topic Code</b>	<b>Topic Title</b>
A.1	Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency (BAWSCA); April 29, 2013	Letter	IN-1	Key facilities of the Regional Water Systems should be described.
			PD-1	Existing wholesale customer turnouts should be identified.
			CU-1	Update cumulative project list.
			UT-1	Provide greater clarity regarding wholesale customer services.
			UT-1	Provide greater clarity regarding wholesale customer services.
A.2	Erik Alm, AICP, District Branch Chief, California Department of Transportation (Caltrans); April 16, 2013	Letter	TR-1	The CCSF is responsible for all mitigation, including improvements to state highways.
			TR-2	CCSF should coordinate with Caltrans prior to submittal of encroachment permit application.
			TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			TR-2	CCSF should coordinate with Caltrans prior to submittal of encroachment permit application.
A.3	Khee Lim, City Engineer, City of Millbrae; April 24, 2013	Letter	PD-2	Limit construction hours.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			BI-1	The approximately 300 trees to be removed at Millbrae in the SFPUC ROW should be replaced.
			PD-4	On-street parking in residential areas should be prohibited.
			UT-2	Any damaged utilities owned by the city should be repaired.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013	Letter	TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			ES-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno.
			ES-2	Public notification should address nighttime lighting during construction.
			ES-3	Lane closure on San Bruno Avenue should not occur during peak hours.
			ES-4	Examine the PPSU project's traffic impacts on Courtland Drive as it extends past the Peninsula High School to Piedmont Avenue.

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013 (Continued)	Letter	ES-5	Lane closure at Whitman Way will create significant traffic delays.
			ES-6	Traffic Control Plan should be submitted to City of San Bruno and the Town of Colma.
			ES-7	A pre-construction parking survey should be prepared for San Bruno North site.
			ES-8	Restrict construction hours to limit noise impacts to residential neighborhoods.
			ES-9	Nighttime noise levels should be limited and performance standards should be identified as part of coordination with the city.
			ES-8	Restrict construction hours to limit noise impacts to residential neighborhoods.
			ES-10	Removal of any tree in San Bruno requires a tree removal permit.
			PD-5	Describe the work that is required for the rear yard of 1840 Cedarwood Court and how the property owner will be approached.
			PD-6	Describe the fencing and security for the open trenches during construction.
			PD-7	Describe unpermitted structures and process for notification of property owners, as well as slope stabilization and replanting post-construction.
			PD-8	Comments regarding Impact TR-1 also apply to San Bruno Avenue West lane closure.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			PD-9	Before discharging water free of chemicals to storm drains, capacity must be verified.
			PD-10	Lane closure at Whitman Way will create significant traffic delays.
			PD-2	Limit construction hours.
PD-2	Limit construction hours.			
PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.			

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013 (Continued)	Letter	PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			PD-11	A third party geotechnical engineer will be required.
			CU-1	Update cumulative project list.
			LU-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno and Town of Colma.
			AE-1	Residents' view of the beautiful Bay from their homes, the San Bruno Chinese Church, and Courtland Drive will be significantly impacted for the duration of the South Bruno South site construction.
			TR-6	The portion of Courtland Drive between north of San Bruno Chinese Church and Madison Avenue is not a City street.
			TR-7	Address intersection LOS discrepancy.
			TR-8	The impact of Walmart.com employees on the I-280 San Bruno Avenue on/off-ramps intersection level of service should be addressed.
			TR-9	Clarify if a staging area would be provided at the San Bruno North site.
			TR-10	A parking survey should be prepared for San Bruno North site and on-street parking should be limited.
			TR-4	Lane closure on San Bruno Avenue should not occur during peak hours.
			TR-5	Lane closure at Whitman Way will create significant traffic delays.
			TR-11	Discuss the non-peak hour impact to the level of service along the haul routes.
TR-12	Discuss impacts of haul trucks to the left turn pocket on San Bruno Avenue to Shelter Creek Lane and the I-280 Crystal Springs Road on/off-ramp.			
TR-13	Describe cumulative impacts related to the Crystal Springs Terrace's New Recreation Building project.			

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.5	Michael P. Laughlin, AICP, Town of Colma; April 29, 2013	Letter	GC-1	Agreement with mitigation measures where comments not provided.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			LU-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno and Town of Colma.
			TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			TR-14	Project construction may affect holiday traffic along Serramonte Boulevard in Colma.
			GE-1	Assure structural stability of the existing retaining wall
			HY-1	The Town of Colma and sewer districts must approve discharges to the storm drain or sanitary sewer systems.
			PD-12	Provide improved landscaping and maintenance of the SFPUC ROW.
A.6	Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board (RWQCB); April 12, 2013	Letter	GC-2	Comments also apply to the Clean Water Act Section 401 water quality certification.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			AL-1	Clean Water Act Section 404(b)(1) Guidelines apply to the project.
			AL-2	The LEDPA analysis should consider alternatives to prevent fill in waters of the U.S.
			BI-2	Clean Water Act Section 404(b)(1) Guidelines apply to the project.
			BI-3	The Vegetation Restoration Plan should address mitigation for temporal losses and monitor success of tree species in riparian habitat for 10 years.
			AL-2	The LEDPA analysis should consider alternatives to prevent fill in waters of the U.S.
			BI-3	The Vegetation Restoration Plan should address mitigation for temporal losses and monitor success of tree species in riparian habitat for 10 years.
			HY-2	Dewatering discharges must be approved by the sanitary sewer agency, or other methods employed.
			HY-3	Revise Mitigation Measure M-HY-1 to be consistent with the Construction General Permit requirements.

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.6	Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board (RWQCB); April 12, 2013 (Continued)	Letter	HY-3	Revise Mitigation Measure M-HY-1 to be consistent with the Construction General Permit requirements.
			HY-4	Dechlorination procedures should incorporate revised standard operating procedures as coordinated with the RWQCB.
B.1	Shelter Creek Condominiums Board of Directors; April 26, 2013	Letter	NO-1	Vibration levels from heavy equipment near buildings.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			NO-3	Construction equipment to be used, access routes to project site, monitoring of vibration. Provide monitoring reports.
			GE-2	Concern about soils at Shelter Creek and pipe materials. Suggestion to extend pipe replacement to driveway.
			GC-3	Concern for warranty of construction work.
			HY-4	Dechlorination procedures should incorporate revised standard operating procedures as coordinated with the RWQCB.
			GE-3	Retaining wall and recycling enclosure within the SFPUC ROW should be assessed by a soil engineer.
			HY-5	Water table levels at Shelter Creek Condominiums and concerns regarding trenching.
			TR-15	Traffic flow into/out of garages at Shelter Creek Condominiums and construction vehicle and resident parking access.
			TR-16	Alternate locations for trash bins at Shelter Creek Condominiums.
			TR-17	Revenue loss from loss of parking spaces during construction.
C.1	Richard Baxter; March 14, 2013	Letter	UT-3	Responsibility for replacing landscaping and irrigation lines after project construction.
			UT-4	Emergency water discharges during construction.
			GC-4	Concern regarding PG&E explosion in San Bruno.

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
C.2	Henry L. Cash and Lais Henderson-Cash; April 26, 2013	Letter	NO-4	Update distance between 1094 Ridgewood Drive and the proposed construction zone.
			GC-5	Lack of response from SFPUC regarding negative impact on property value.
			NO-5	Sound of water rushing through pipeline can be heard at night. Adverse effects of this noise should be addressed and insulation should be installed on pipe as part of proposed project.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			GC-6	Why is the SFPUC ROW located between two residences instead of in the middle of the street at 1094 Ridgewood Drive?
			PD-13	Provide greater detail regarding the retaining wall proposed along the rear property line of 1094 Ridgewood Drive.
			PD-14	Identify when the trees at Millbrae site will be marked for removal.
			AE-2	Show a photo of the area behind 1094 Ridgewood Drive and a mock-up of what the area would look like after project construction.

GC-7 How will protocols (mitigation) be enforced for the project? d:\MC 1P /MC1D 50 >

**Table RTC 3-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
C.4	Clara R. Taylor; April 16, 2013	Letter	GC-9	Concern with construction trucks trips and impacts on traffic, noise, and air quality.
			TR-18	Construction traffic safety concerns to nearby schools and churches.
			GC-10	Concern about the environment, impact on families, and wildlife.
			AL-3	Should find another route for the project.
TR.1	(1) Michael Allen, General Counsel, Shelter Creek Condominiums; April 16, 2013 (2) Alan Wong, Deacon, San Bruno Chinese Church; April 16, 2013 (3) Anthony Cheung, Deacon, San Bruno Chinese Church; April 16, 2013 (4) Charlie Royce, Director of Administration for Central Peninsula Church; April 16, 2013	Transcript	GC-11	Change made to staging area at Peninsula High School (no longer staging on the basketball courts).
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			TR-18	Construction traffic safety concerns to nearby schools and churches.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			TR-15	Traffic flow into/out of garages at Shelter Creek Condominiums and construction vehicle and resident parking access.
			TR-16	Alternate locations for trash bins at Shelter Creek Condominiums.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			GC-12	Construction truck trips and impact on neighborhood.
			GC-13	Use of a portion of the San Bruno Chinese Church parking lot for staging area.
TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.			
TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.			
TR.2	Michael J. Antonini, Commissioner, San Francisco Planning Commission; April 18, 2013	Transcript	GC-14	Segmental pipe replacement.



## 3.1 General Comments

### **Comment GC-1: Agreement with mitigation measures where comments not provided.**

Thank you for the opportunity to comment on items discussed in the EIR for the Peninsula Pipeline Seismic Upgrade Project. After reviewing the document, we are in agreement with all the mitigation measures that will be applied to the project, and where we have not commented, we concur with the recommended mitigation measure. (*Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013*)

#### **Response GC-1**

Your general concurrence with the Draft EIR mitigation measures is noted.

### **Comment GC-2: Comments also apply to the Clean Water Act Section 401 water quality certification.**

Please note that these comments also apply to the submission of Project information in the application for Clean Water Act (CWA) Section 401 water quality certification and should also be addressed therein. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

#### **Response GC-2**

The San Francisco Bay Regional Water Quality Control Board's (RWQCB's) comments will be considered in the San Francisco Public Utilities Commission's (SFPUC's) application for Clean Water Act Section 401 water quality certification, which differs from the California Environmental Quality Act (CEQA) process.

### **Comment GC-3: Concern for warranty of construction work.**

We also understand that we are to be "covered" for two years, but after all the problems historically on property with San Bruno water pipe mains and what was found with the storm drain system, it would be nice to err on the side of caution. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

#### **Response GC-3**

This comment does not address the adequacy or accuracy of the EIR, and this response is provided for information purposes only. The typical construction warranty is for 2 years after completion. The SFPUC Real Estate Right-of-Way (ROW) Division will meet with individual property owners to discuss each party's real estate rights and expected impacts from this project. The SFPUC's intent is to outline these issues and reach written agreement on them with property owners before the construction contract is opened for bid.

### **Comment GC-4: Concern regarding PG&E explosion in San Bruno.**

I'm very much interested in information concerning the San Bruno PG&E Explosion of September 9, 2010. The explosion occurred several blocks near my condominium, Shelter Creek

Condominium Complex, and as a concerned citizen, I am seeking information as to what really happened that early evening of September 9, 2010. There was a black-out in my condominium complex throughout the night and traffic was blocked leading to the complex, San Bruno West.

Would you please mail me the information requested. (*Richard Baxter; letter, March 14, 2013*)

#### **Response GC-4**

This comment does not address the adequacy or accuracy of the EIR, and this response is provided for information purposes only. Information concerning the San Bruno Pacific Gas and Electric Company (PG&E) explosion of September 9, 2010, is not related to the Draft EIR for the proposed project, which would replace portions of water pipelines, not gas pipelines. The City of San Bruno keeps updated information on this event on its website. See [http://sanbruno.ca.gov/Glenview\\_newsandevents.html](http://sanbruno.ca.gov/Glenview_newsandevents.html) for information, or call the Glenview Fire Hotline Number: (650) 616-7180, Option 2.

#### **Comment GC-5: Lack of response from SFPUC regarding negative impact on property value.**

The DEIR has failed to address our specific real estate property questions and concerns that we submitted to the department on December 5, 2011, regarding the proposed project the negative impact on our property value, required property-disclosure, indemnification, property restoration, and insurance liability issues. We were advised that someone in the Real Estate Services Department (RES) would contact us regarding these matters; to date no one in the RES department has contacted us. We sincerely hope that this lack of follow-up by the RES is not an indicator of what is to come with this project. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

#### **Response GC-5**

This comment regarding the project's impact on property values and concerns regarding SFPUC response to property owner is noted. Subsequent to the close of the Draft EIR comment period, the SFPUC did meet with the commenter to discuss these issues. This comment does not raise environmental concerns that pertain to the environmental analysis pursuant to CEQA, and is therefore not addressed further.

#### **Comment GC-6: Why is the SFPUC ROW located between two residences instead of in the middle of the street at 1094 Ridgewood Drive?**

The SFPUC had the opportunity to acquire the 132 by 50 feet of land when it installed the Sunset Supply Branch Pipeline, fence it off or leave it as adjacent open space to Millbrae's Spur Property (aka the staging ground). Ridgewood Drive at Banbury Lane is a dead end street and Banbury is only a block long. It was not necessary or the logical choice for SFPUC to encumber these two residences (1094 & 1100 Ridgewood Drive). It is our understanding that most of the SFPUC Right of Way are located in the center of the public streets, and are owned by the City and County of San Francisco in fee, and then the questions becomes why all the inconsistency at this location. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

### Response GC-6

This comment regarding the establishment of the SFPUC ROW and its location crossing the 1094 and 1100 Ridgewood Drive residential properties is noted. As required by CEQA, the EIR addresses the environmental consequences of the proposed project; however, this comment relates to the existing location of the SFPUC ROW, does not pertain to the environmental effects of the proposed project, and therefore is not discussed further.

### Comment GC-7: How will protocols (mitigation) be enforced for the project?

We are also concerned about application of the protocols enumerated in the DEIR. From our experience from 49 years of involvement in construction and project maintenance, that issues like idling trucks and machinery, daily debris clean up, security, and some time safety issues are not addressed until a problem arises. For example, a delivery truck pull-up and blocks someone's driveway because the driver is only going to be there a for minute, and or a supervisor drives up does the same thing one minute turns into several and now the neighbors are up in arms because this scene is repeated multiple time in a day. Not many people employed in the construction industry stop what they are doing to walk over to the trash/recycle container and properly dispose of their sawdust, bent nails, broken bits, cans, and skew number tags etc. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

### Response GC-7

Some workplace issues are addressed in Mitigation Measures in the Draft EIR. For instance, Mitigation Measure M-AQ-1: BAAQMD Basic Construction Measures, on pages 5.8-20 and 5.8-21 of the Draft EIR, states:

- Idling times for construction equipment (including vehicles) shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. Clear signage of this requirement shall be provided for construction workers at all access points to construction areas.

Also, in Section 5.14.3.4, Biological Resources, Construction Impacts and Mitigation Measures, Mitigation Measure M-BI-1a: General Protection Measures, on pages 5.14-39 and 5.14-40, the first bullet states:

- Construction contractor(s) shall minimize the extent of the construction disturbance as much as feasible, which shall be limited to boundaries of the project sites.

Additionally, the third and fourth bullets state:

- Project-related vehicles shall observe a 15-mile-per-hour speed limit on unpaved roads in the work area, or as otherwise determined by the applicable regulatory agencies.
- The contractor shall provide closed garbage containers for the disposal of all food-related trash items (e.g., wrappers, cans, bottles, food scraps). All garbage shall be collected daily from the project site and placed in a closed container from which garbage shall be removed weekly.

The CEQA Guidelines (Section 15097) require preparation of a Mitigation Monitoring and Reporting Program (MMRP), which is designed to ensure implementation of mitigation measures identified in the Final EIR to reduce or avoid the project's significant environmental effects.

Upon certification of the Final EIR, the SFPUC will review and consider the Final EIR prior to making a decision regarding project approval. If the SFPUC approves the proposed project, it will adopt environmental findings and a MMRP at the project decision hearing. Worksite issues such as those raised by the commenter are also explicitly addressed in standard specifications provided in SFPUC's construction contract documents; oversight of these standards will be provided during construction by the inspectors and specialty monitors (e.g., biologists, archaeologists, and paleontologists) in SFPUC's construction management and environmental compliance teams, who will verify and document compliance with the MMRP. Over the past 5 years, a consistent team of SFUPC construction management oversight personnel has been monitoring construction of other Water System Improvement Program (WSIP) projects, and will do the same for the PPSU project.

**Comment GC-8: Keep us on the mailing list for the project.**

Lastly, we realize that this is a draft EIR and not the final EIR report, but it would be comforting to know that all of these issues are being addressed concurrently. We ask that you keep us on the distribution mailing list and continue to keep updated regarding any developments in the Peninsula Pipeline Seismic Upgrade Project. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

**Response GC-8**

This comment does not address the adequacy or accuracy of the EIR, and this response is provided for information purposes only. The commenter will be kept on the distribution mailing list and will be provided with all public updates regarding the proposed project.

**Comment GC-9: Concern with construction trucks trips and impacts on traffic, noise, and air quality.**

As I had stated in our conversation that I am very concerned about this project and the heavy trucks with heavy loads of equipment and perhaps soil [illegible] and the noise levels, air quality and many other significant impacts relating to the project. (*Clara R. Taylor; letter, April 16, 2013*)

**Response GC-9**

The proposed project's effect on noise, air quality, and other environmental resources as a result of construction trucks with heavy loads of equipment, materials, and spoils are analyzed in the Draft EIR. Section 5.7.3.4 analyzes the noise impacts related to construction vehicle traffic (and other construction-related noise) in Impact NO-1: Daytime construction activities could result in substantial temporary increases in ambient daytime noise levels that could interfere with nearby land uses; this impact analysis begins on page 5.7-26 of the Draft EIR. Table 5.7-12, Summary of Daytime Construction Noise Impacts by Site and Construction Phase, displays the level of impact by construction phase for sensitive receivers at the various project sites. Residences along Ridgewood Drive would experience significant and unavoidable daytime noise impacts for up to 4.5 months during construction, even with

implementation of Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls (Draft EIR pages 5.7-31 through 5.7-33), which requires noise control measures and noise barrier walls as part of a Noise Control Plan.

Section 5.8.3.4 analyzes the air quality impacts related to construction vehicle traffic and other sources such as construction equipment. Impact AQ-1: Project construction could violate air quality standards or contribute significantly to an existing air quality violation, states that, "Emissions from the PPSU [Peninsula Pipelines Seismic Upgrade] project's construction equipment and vehicles would be generated from multiple sources, including heavy mobile equipment and delivery/haul trucks, worker vehicles, and semi-stationary sources such as air compressors and generators" (page 5.8-19). The analysis determined that "the Bay Area Air Quality Management District (BAAQMD) CEQA significance thresholds for emissions of criteria pollutants generated during construction would not be exceeded in 2014 or 2015, and such emissions would therefore be less than significant" (page 5.8-19). The Draft EIR further found that fugitive dust emissions could be significant, and identified Mitigation Measure M-AQ-1: BAAQMD Basic Construction Measures to control dust and reduce this impact to a less-than-significant level (pages 5.8-20 and 5.8-21). The Draft EIR also found that project construction would not expose sensitive receptors to substantial pollutant concentrations (Impact AQ-2 beginning on page 5.8-20).

Construction vehicles could also affect traffic and circulation, as discussed in Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures. Impacts of project construction on roadways are analyzed in Impact TR-1: Project construction could substantially conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of travel, beginning on page 5.6-16 of the Draft EIR. The analysis indicates that, "The PPSU project would result in short-term increases in construction-related vehicle trips on area roadways. These vehicle trips would include construction workers traveling to and from the five project sites and the common staging area; haul truck trips associated with the disposal of excavated materials; and material and equipment deliveries" (page 5.6-17). The Draft EIR concluded that this impact would be significant only when the temporary closures of the right-turn lane of the Interstate 280 (I-280) off-ramp and the eastbound San Bruno Avenue West lane adjacent to the San Bruno North project site would occur simultaneously, and identified Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, described on pages 5.6-23 and 5.6-24 of the Draft EIR, which would reduce this impact to a less-than-significant level. Please see Response ES-8 and Response PD-2 above for an additional response pertaining to noise.

The Draft EIR also stated that, "The increase in vehicles traveling to and from the project sites during construction could increase traffic safety hazards due to potential conflicts between construction vehicles (with slower speeds and wider turning radii than autos) and automobiles, bicyclists, and pedestrians" in Impact TR-3: Project construction activities could decrease the safety of public roadways for vehicles, bicyclists, and pedestrians, beginning on page 5.6-35. Mitigation Measure M-TR-3: Traffic Control Plan, described on pages 5.6-36 through 5.6-38, provides for a series of actions that would reduce this impact to a less-than-significant level.

Although the commenter is not specific as to other significant impacts relating to this project, the above impact areas would be most affected by heavy construction truck trips. It should be

noted that all construction impacts of the proposed project, except noise in limited locations, would be reduced to a less- than-significant level.

**Comment GC-10: Concern about the environment, impact on families, and wildlife.**

My other concern is the environment which would be quite an impact on the families that live in this area, also all the wildlife living in the Spur property. (*Clara R. Taylor; letter, April 16, 2013*)

**Response GC-10**

Although the commenter is not specific as to how the environment would be an impact on area families, the 16 sections of Chapter 5 of the Draft EIR analyze various environmental topics. Section 5.2, Land Use and Land Use Planning, may address this comment, as described in Section 5.2.3.2, Approach to Analysis: "This analysis considers the proposed project's potential to adversely affect the existing character of the vicinity and the project's potential to substantially impact or disrupt existing land uses or land use activities either directly or indirectly during construction or operation. Direct impacts could include temporary displacement or disruption of access to existing land uses, or a substantial impact on the existing character of the vicinity. Indirect impacts on land uses or land use activities could result from a combination of short-term effects, including emissions of criteria air pollutants, increased noise levels, traffic safety hazards, and impeded access related to traffic congestion and detours. These temporary effects could indirectly disturb or disrupt land uses in the vicinity of the project area in a way that substantially alters the land use character. The direct physical impacts related to each of these topics are analyzed separately in Sections 5.6, Transportation and Circulation; 5.7, Noise; and 5.8, Air Quality. Findings are summarized in this section to evaluate their indirect effects on existing land uses" (page 5.2-10 of the Draft EIR).

Wildlife impacts are identified in Section 5.14.3.4, Biological Resources, Construction Impacts and Mitigation Measures. Impact BI-1, beginning on page 5.14-36 of the Draft EIR, notes that construction of the proposed project could result in significant impacts associated with the temporary loss of habitat for Mission blue butterfly; temporary loss of potential California red-legged frog dispersal habitat; and loss of breeding habitat for San Francisco dusky-footed woodrat, birds, raptors, and bats; and identifies mitigation measures to reduce these impacts to a less-than-significant level. Mitigation Measures M-BI-1a through M-BI-1h are described on pages 5.14-39 through 5.14-46 of the Draft EIR; and Mitigation Measure M-HY-1 is described on pages 5.16-15 through 5.16-19 of the Draft EIR.

**Comment GC-11: Change made to staging area at Peninsula High School (no longer staging on the basketball courts).**

MR. ROYCE: Charlie Royce, Director of the Administration for Central Peninsula Church. We meet here at a proximal site on Sundays. We also have some midweek meetings here as well. I'm not particularly fond of the work in the area, but initially when I went to the first meeting, the diagram that I was shown included an area in the basketball court up here, that was planned to be a staging area. I see that today on the diagram that that's no longer the case and I appreciate that not being there, because we are required through our ministries permit with the City of San Bruno to use that as our parking on Sundays. And if it was used for a staging area, we would have no parking on

Sundays or on Wednesdays, so I appreciate that that's no longer in consideration. (*Charlie Royce, Director of Administration for Central Peninsula Church; public hearing transcript, April 16, 2013*)

### **Response GC-11**

The comment regarding the staging area at the Peninsula High School is noted.

### **Comment GC-12: Construction truck trips and impact on neighborhood.**

But as far as the workflow, pretty often have what I see, some that the impact report that you'll be doing at almost at 2,000 -- more than 2,000 truckloads of the dirt in and out of the area. So I wonder that [inaudible] should be tremendous effect. Not only our church as well, but also the neighborhood. The road should be quite a tremendous effect -- environmental concern, like the dirt, the air -- and the people -- that's a lot of people in and out of the area, things like that, that one also concerns. (*Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013*)

### **Response GC-12**

As described in Table 3-2, Project Materials Transport, on page 3-26 of the Draft EIR, an estimated 4,100 total truck trips would be required at the San Bruno North and San Bruno South sites, considering both off-haul and on-haul trips. This number of trips is accounted for in the air quality impact analysis, Section 5.8.3.4, Construction Impacts and Mitigation Measures. The analysis states that BAAQMD and the EIR consider uncontrolled fugitive dust from construction activities to be significant. BAAQMD's Basic Construction Measures, incorporated into the EIR as Mitigation Measure M-AQ-1: BAAQMD Basic Construction Measures, would reduce fugitive dust emissions to less than significant with mitigation. As described on pages 5.8-20 and 5.8-21, along with posting names and telephone numbers of SFPUC and BAAQMD individuals for reporting complaints, this mitigation measure would require that, to reduce fugitive dust, the BAAQMD-recommended Basic Construction Measures be included in all construction contract specifications for the proposed project.

### **Comment GC-13: Use of a portion of the San Bruno Chinese Church parking lot for staging area.**

And I noticed that the staging area, I'm not sure quite what that means by the staging area. Are you using that to store all the equipment and things like that or are you using those parking spaces for parking? (*Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013*)

### **Response GC-13**

As described in Section 3.8.6, Project Description, Construction Staging and Spoils Areas, on page 3-30 of the Draft EIR "... proposed temporary staging and spoils areas would be used for materials and equipment staging and laydown, worker vehicle parking, temporary construction equipment trailers and office trailers, and temporary stockpiling of spoils and construction debris. No spoils would be left in these areas after project construction is completed. Temporary fencing would be installed around these staging areas to prevent public access."

### **Comment GC-14: Segmental pipe replacement.**

Commissioner Antonini: Yeah, I just wanted to mention that we -- this has been somewhat segmental. Obviously we have different parts of the system that are dealt with.

It seemed to me we did do a pipe replacement about two years ago in the area of Ralston Boulevard in Belmont. And this is another -- maybe this is a little further north. I'm just not sure why this area is being dealt with separately from that one. Maybe it's geographical.

Steven Smith: If I could defer to the PUC project manager to respond to this item, just for clarification? I don't see that as an environmental impact question per se.

Commissioner Antonini: No, it's not really. It's just a project question.

Steven Smith: If you're interested, I could have somebody from PUC respond to that, clarify.

Commissioner Antonini: Maybe clarification would probably be okay if we can do that. Maybe it should come in comments and responses.

Steven Smith: That's fine.

Commissioner Antonini: You know, just clarify the segments of the plan. And it's been very well done. You know, we've had a lot of different parts. Just verify that this is -- you know, there may be one coming up in the future for another area. (*Michael J. Antonini, Commissioner, San Francisco Planning Commission; public hearing transcript, April 18, 2013*)

#### **Response GC-14**

The SFPUC identified the need for the PPSU project as a result of geotechnical investigations in connection with the Harry Tracy Water Treatment Plant (HTWTP) Long-Term Improvements Project, which was approved and adopted by the SFPUC in 2010. As described in Section 3.2, Project Background, on page 3-10 of the Draft EIR: "During these investigations, the SFPUC determined that fault strands within the plant's site could cause significant failure in existing facilities in the event of a major San Andreas earthquake (G&E/GTC Joint Venture, 2011). The fault strands were determined to be part of the Serra Fault system, a secondary fault located along the peninsula in San Mateo County. As a result, additional geotechnical studies were pursued to determine the ability of the Peninsula water transmission system to achieve the adopted WSIP Level of Service (LOS) goal related to seismic reliability. The LOS goal requires that within 24 hours of a major earthquake on the San Andreas Fault, the HTWTP must be capable of delivering up to 140 million gallons per day of potable drinking water to customers within the Regional Water System and in the City and County of San Francisco. During these additional investigations of the Serra Fault system, the SFPUC identified areas along the San Andreas Pipeline No. 2 (SAPL2), San Andreas Pipeline No. 3 (SAPL3), and Sunset Supply Branch Pipeline (SSBPL) that are susceptible to liquefaction, ground shaking, and landslides (G&E/GTC Joint Venture, 2011). As a result of these studies, the SFPUC identified the six pipeline segments in need of seismic improvements that are the subject of this EIR."

The closest SFPUC project to the area noted by the commenter is the New Crystal Springs Bypass Tunnel project, located on Polhemus Road (which turns into Ralston Avenue, south of Highway 92). The need for the PPSU project was not known when the tunnel bypass project was planned.



## 3.2 Executive Summary

### **Comment ES-1: Extend public notification boundaries and develop an agreed notification process with City of San Bruno.**

Table 1-1

Impact LU-1 (page 1-8)

The construction contractor shall also comply with City of San Bruno's noise regulations pursuant to Section 6.16.070 of the San Bruno Municipal Code.

What is the noise impact influence zone? The listed addresses for the San Bruno North and South sites are mostly immediately adjacent to the construction areas. Public notification should be beyond Cedarwood Court and Pepper Drive.

SFPUC shall coordinate with the City of San Bruno to develop an agreed public notification boundaries and process, which includes notification time frames, distribution frequency, interim updates, project website, and etc. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

#### **Response ES-1**

San Bruno Municipal Code Section 6.16.070, Construction of buildings and projects, states that "No person shall, within any residential zone, or within a radius of five hundred feet therefrom, operate equipment or perform any outside construction or repair work on any building, structure, or other project, or operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction-type device which shall exceed, between the hours of seven a.m. and ten p.m., a noise level of eighty-five decibels as measured at one hundred feet, or exceed between the hours of ten p.m. and seven a.m. a noise level of sixty decibels as measured at one hundred feet, unless such person shall have first obtained a permit therefor from the director of public works. No permit shall be required to perform emergency work (City of San Bruno, 1998)."

The proposed project's weekday construction workday is planned to start at 7:00 a.m. and end at 5:00 p.m. (see the first sentence of page 3-36 in Chapter 3, Project Description). The Draft EIR acknowledges the San Bruno Municipal Code Section 6.16.070 on page 5.7-19 in Section 5.7.2. The proximity of some San Bruno residences to the SFPUC ROW in locations where pipeline repair or replacement is required, or where dewatering is required, will not allow for these noise limits to be met, even with implementation of mitigation, resulting in indirect land use impacts related to disruption of existing land uses or land use activities. This is described in Section 5.2.3.4, Construction Impacts and Mitigation, under Indirect Impacts, Impact LU-1, pages 5.2-10 and 5.2-11 of the Draft EIR, which states that project construction could have a substantial temporary direct or indirect impact on the existing character of the vicinity or could substantially impact or disrupt existing land uses or land use activities. Mitigation Measure M-LU-1b, described on page 5.2-12 of the Draft EIR, requires that the SFPUC or its contractor provide 14-day advance notice by mail or hand delivery to all residents, tenants, and/or property owners in those San Bruno homes listed below as being potentially subject to significant and unavoidable noise impacts, even after

administrative and source controls described in Mitigation Measure M-NO-1, on pages 5.7-31 through 5.7-33 of the Draft EIR, are implemented:

- **San Bruno North Site** – Cedarwood Court (address numbers 1790, 1791, 1800, 1801, 1820, 1821, 1840, and 1841); and Pepper Drive (address numbers 763, 769, 773, 779, 783, 789, 793, and 795); and
- **San Bruno South Site** – Courtland Drive (address numbers 300, 306, 310, 316, 320, 326, 330, 336, 340, 350, 360, and 370); Shelter Creek Condominiums Buildings 4A, 4B, and 4D; and Park Plaza Apartments.

The Draft EIR goes on to state that, “Although the direct impact resulting from construction noise is considered significant and unavoidable (refer to Section 5.7, Noise), implementation of Mitigation Measures M-LU-1a and M-LU-1b would reduce indirect land use impacts resulting from construction activities by providing sufficient notification, options, and suggestions for occupants; therefore, the impact would be *less than significant with mitigation.*”

Although Mitigation Measure M-LU-1b identified on page 5.2-12 of the Draft EIR is focused on homes that would potentially be subject to significant and unavoidable noise impacts, Mitigation Measure M-LU-1a is focused on broader area, namely businesses, property owners, facility managers, and residents of adjacent areas potentially affected by the PPSU project. For homes in the City of San Bruno, this area is defined in the mitigation measure as residences adjacent to the construction zone along Cedarwood Court and Pepper Drive; Park Plaza Apartments and Shelter Creek Condominiums; residences adjacent to the construction zone along Courtland Drive; Peninsula High School and other uses at the former Crestmoor High School campus; Peninsula High School Athletic Fields; and San Bruno Chinese Church (see page 5.2-11 of the Draft EIR).

The SFPUC or its construction contractor will coordinate with the City of San Bruno regarding public notification procedures, and the following text change has been made to page 5.2-11 of the Draft EIR.

Mitigation Measure M-LU-1a: Notice of Construction Activities, on page 1-6 and page 5.2-11, has been revised to include a new second sentence in the first paragraph:

The SFPUC or its contractor will coordinate with the City of San Bruno to agree on a public notification process and notification boundaries in San Bruno.

This revision does not change the analysis or conclusions presented in the Draft EIR.

### **Comment ES-2: Public notification should address nighttime lighting during construction.**

Impact AE-2 (page 1-11)

Will the impacted residents be informed of the potential lighting spillover during night construction? If yes, this should be part of the public notification process to be developed with the City of San Bruno. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

### **Response ES-2**

Lighting would not be required for nighttime dewatering activities, but would be required for nighttime construction at the San Bruno North site, as described in Section 5.3.3.4 on

pages 5.3-29 and 5.3-30 of the Draft EIR. As described on these pages, "... because lighting could be visible from the adjacent residences as well as from I-280, impacts from lighting or glare during nighttime construction at the San Bruno North site could result in a significant impact. Implementation of Mitigation Measure M-AE-2: Site-Specific Construction Lighting Plan would reduce light and glare impacts by requiring the SFPUC's contractor to develop a site-specific lighting plan that includes locations and methods to minimize light spillover and glare impacts. In addition, implementation of Mitigation Measure M-LU-1b: Minimum 2-Week Notice of Construction Activities to Homes with Significant Unavoidable Noise Impacts, which requires 2-week advance notification of construction activities to adjacent residences at the San Bruno North site (among other sites), would alert residents to upcoming nighttime construction activities, and provide a toll-free number for reporting problems regarding construction-related complaints." Because residents would be alerted to nighttime construction activities, they would be notified in advance regarding the potential for both nighttime construction lighting and nighttime noise.

See Response ES-1 regarding coordination with the City of San Bruno for the public notification process.

**Comment ES-3: Lane closure on San Bruno Avenue should not occur during peak hours.**

Impact TR-1 (page 1-23)

San Bruno North Site:

San Bruno Avenue is a major arterial for residents and is near to employee centers. Lane reduction on this high use arterial will create a significant traffic impact during peak and non-peak hours on both local streets and freeway on/off-ramps. The City of San Bruno will not support any lane reduction during peak hours. Any lane closure on San Bruno Avenue shall only occur during non-peak hours between 9 a.m. and 4:30 p.m. At the end of each construction day and before opening the lane for traffic, the access pit shall be steel plated and secured to prevent movement and excess vibration. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

Response ES-3

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to operate at LOS C during the a.m. and p.m. peak hours with the addition of the construction vehicle trips generated by the San Bruno North and San Bruno South sites.” Therefore, elimination of lane reductions would not be required under either of these conditions.

Page 5.6-23 of the Draft EIR, which has been revised for consistency with Table 5.6.9 in the Draft EIR, further describes LOS impacts to the I-280 Northbound ramps/San Bruno Avenue West as follows: “The temporary closures of the right-turn lane of the I-280 off-ramp and the eastbound San Bruno Avenue West lane adjacent to the project site may occur simultaneously. As indicated in Table 5.6.9, with the closure of both lanes, the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) would operate at LOS E during the a.m. peak hour, which would not be an acceptable LOS per San Francisco Planning Department or City of San Bruno traffic policy; during the p.m. peak hour it would operate at LOS D, which would be considered an acceptable LOS. Therefore, the LOS E condition at the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) during the a.m. peak period is considered to be a significant impact. However, impacts related to the lane closures would be reduced to a less-than-significant level with implementation of Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour (Draft EIR pages 5.6-23 and 5.6-24), which would allow the LOS at the intersection to be maintained at LOS D. This measure would require that the SFPUC contractor maintain the eastbound traffic flow through the intersection of I-280 Northbound ramps/San Bruno Avenue West by plating over the access pit that extends into the eastbound lane of San Bruno Avenue West during the a.m. peak period.”

Therefore, no lane reductions would occur during the a.m. peak period (generally from 7:00 a.m. to 9:00 a.m.). Lane reductions that could occur during the p.m. peak period would result in LOS D operating conditions at the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3), which would be considered an acceptable LOS, and would not result in a significant impact under the traffic policies of either the San Francisco Planning Department or the City of San Bruno, as described on page 5-6.23 of the Draft EIR.

If additional restrictions on the lane closures are required during the encroachment permit negotiations, then the estimated 1-month duration for construction activities at the San Bruno North site would likely be extended. For information regarding closure of the right-turn lane of the I-280 off-ramp—which is dependent on approval by the California Department of Transportation (Caltrans)—and regarding anticipated nighttime construction if Caltrans approval is not received, please see Response ES-9.

**Comment ES-4: Examine the PPSU project’s traffic impacts on Courtland Drive as it extends past the Peninsula High School to Piedmont Avenue.**

San Bruno South Site:

Students, faculty members, parents, and recreational users of the field use the access road within the Peninsula High School property. Nearby resident also use this road frequently get to/from Pediment Avenue and Whitman Way. Has a traffic analysis been prepared to exam and evaluate the potential traffic impact during construction? (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

#### Response ES-4

A separate stand-alone analysis of traffic impacts was not conducted, but was instead integrated directly into the Draft EIR. In Section 5.6, Transportation and Circulation, of the Draft EIR, pages 5.6-25 and 5.6-26 present a discussion of the potential impacts of construction vehicles and activities at the San Bruno South site, including the impact of construction vehicle traffic at the intersection of Courtland Drive/Whitman Way, and on Courtland Drive. As noted in Table 5.6-9 on page 5.6-19 of the Draft EIR, the intersection of Courtland Drive/Whitman Way (Intersection #7) would continue to operate at LOS B or LOS A conditions during both the a.m. and p.m. peak hour, respectively, with the addition of the San Bruno South construction vehicles. As noted on page 5.6-25 of the Draft EIR, existing traffic volumes on Courtland Drive are about 1,050 vehicles per day, with about 25 percent of daily traffic occurring during the a.m. and p.m. peak hours. The addition of San Bruno South construction vehicles to Courtland Drive between Whitman Way and the PPSU staging area within the Peninsula High School parking lot would be accommodated within the travel lane capacity without substantial delays. However, in general, the presence of construction truck traffic in the traffic flow would temporarily reduce roadway capacities due to the slower travel speeds (e.g., particularly in the southbound uphill direction on Courtland Drive). Drivers on Courtland Drive between Whitman Way and the PPSU staging area in the Peninsula High School parking lot would experience intermittent delays, particularly if they were traveling behind a construction truck. Construction trucks would not travel on Courtland Drive south of the PPSU staging area in the Peninsula High School parking lot, or on Piedmont Avenue. No significant traffic impact would result in this area.

#### Comment ES-5: Lane closure at Whitman Way will create significant traffic delays.

Combination of 236 truck-trips per day (worst scenario) and one-lane control at Whitman Way, the City of San Bruno is extremely concerned that access to the east part of the City will be delayed significantly. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

#### Response ES-5

SAPL2 and SAPL3 cross Whitman Way, as described in Chapter 3, Project Description, on page 3-32 of the Draft EIR. There is no feasible way to replace these pipeline segments without closing at least one lane of traffic at a time. (Access pits and tunneling underneath Whitman Way would not be feasible, given the constrained nature of the area, the required size of access pits on either side of Whitman Way—10 feet by 10 feet—and the additional noise disruption to Shelter Creek Condominium and Park Plaza Apartment residents that would occur.)

As described in Transportation and Circulation, Section 5.6.3.4, Construction Impacts and Mitigation Measures, Impact TR-1, San Bruno South Site, Impacts on Roadways from Construction Traffic, page 5.6-27 of the Draft EIR, "Lane closures would result in additional vehicle delay when alternate one-way traffic operations are required, and some drivers might shift to other, potentially less convenient routes to access their destination. Vehicles would be delayed in the vicinity of the construction zone. These impacts would typically occur only during the day; the contractor would use steel plates to restore vehicle access at the end of each workday."

Also on page 5.6-27, the Draft EIR states that “These [peak-hour traffic] volumes would be accommodated with alternate one-way operations, although some drivers may choose to use other routes to access their destination...Both local residential streets and collector streets have available capacity to accommodate the low volume of potential diversion. Although traffic impacts at intersections and along roadway segments at the San Bruno South site would be less than significant, Mitigation Measure M-TR-3: Traffic Control Plan includes measures that would manage traffic flow during construction activities, and alert drivers to upcoming construction activities.”

**Comment ES-6: Traffic Control Plan should be submitted to City of San Bruno and the Town of Colma.**

Impact TR-3 (page 1-24 & 1-27)

Traffic Control Plan:

Prior to SFPUC's approval of the traffic control plans, the plans shall be submitted to the City of San Bruno for review and comment. The construction contractor shall also obtain an encroachment permit from the City of San Bruno for encroaching San Bruno Avenue and Whitman Way. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response ES-6**

In response to the City of San Bruno's comment, the Draft EIR has been revised as follows.

The first paragraph in Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, page 1-23 and page 5.6-24 of the Draft EIR:

The SFPUC or its contractor(s) shall coordinate with the City of San Bruno and Caltrans, and the plan for maintaining access shall conform to the ~~State's Manual of Traffic Controls for Construction and Maintenance Work Areas~~ California Manual on Uniform Traffic Control Devices (Caltrans, ~~2006~~2012).

The second paragraph in Mitigation Measure M-TR-3: Traffic Control Plan, page 1-24 and page 5.6-36 of the Draft EIR:

The [traffic control] plan shall conform to the California Manual on Uniform Traffic Control Devices ~~State's Manual of Traffic Controls for Construction and Maintenance Work Areas~~ (Caltrans, ~~2012~~2006) and shall incorporate the applicable requirements of the jurisdictions of the Town of Colma and the cities of South San Francisco, San Bruno, and Millbrae. It shall be provided for review and comment if requested by these jurisdictions, where applicable.

Section 3.10.3 of Chapter 3, Project Description, notes on page 3-38 that encroachment permits would be required from the various cities in which the project would be constructed.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment ES-7: A pre-construction parking survey should be prepared for San Bruno North site.****Specific Site Measures:**

Before allowing maximum 10 of construction workers' vehicles to park on residential streets adjacent to the San Bruno North site, a pre-construction parking survey shall be prepared to identify parking demand during the time frames when construction vehicles are expected to park on these residential streets. The City of San Bruno will determine whether to allow construction parking on residential streets base on the parking survey result. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response ES-7**

Analysis of construction worker parking has been provided in the Draft EIR. Although no significant parking impacts were identified in the Draft EIR, the SFPUC will, in response to this comment, prepare a pre-construction parking survey to identify the parking demand during the time frames when construction vehicles are proposed to park on residential streets in San Bruno.

The parking information for the San Bruno North site described under Impact TR-1, on page 5.6-25 of the Draft EIR, has been revised to include the following text after the first full paragraph at the top of the page:

Although the PPSU project would not have significant parking impacts, the following improvement measure has been included to address concerns related to on-street construction worker parking raised during the Draft EIR public review period.

**Improvement Measure I-TR-A: Pre-construction Parking Survey at San Bruno North Site**

Develop and implement a pre-construction survey of on-street parking supply and demand during the time frames when construction workers are expected to park in the vicinity of the San Bruno North site. The pre-construction on-street parking survey would be conducted on residential streets to the south of San Bruno Avenue West where on-street parking is permitted (for example, Cherry Avenue, Hickory Avenue, and Cedarwood Court), and results of the survey shall be submitted to the City of San Bruno. The SFPUC shall coordinate with the City of San Bruno regarding the feasibility and location of construction worker vehicle parking on residential streets.

Section 1.5, Summary of Project Impacts and Mitigation Measures, on page 1-5 of the Draft EIR, has been revised to include the following text after the second sentence in the first paragraph:

Where called for, improvement measures are also identified in Chapter 5 to reduce the effects of impacts that would be less than significant. Table 1-2 summarizes these measures.

The Draft EIR has been revised to include the following Table RTC 3-2, which will be the new Table 1-2 on page 1-99 (see also Response TR-12 below regarding Improvement Measures I-TR-B and I-TR-D; and Response PD-4 below regarding Improvement Measure I-TR-C).

**Table RTC 3-2**  
**Summary of Improvement Measures for Proposed Project (Table 1-2)**

<u>Improvement Measures</u>	<u>Applies to Project Site</u>
<b><u>Section 5.6: Transportation and Circulation</u></b>	
<p><b><u>Improvement Measure I-TR-A: Pre-construction Parking Survey at San Bruno North Site</u></b></p> <p><u>Develop and implement a pre-construction survey of on-street parking supply and demand during the time frames when construction workers are expected to park in the vicinity of the San Bruno North site. The pre-construction on-street parking survey would be conducted on residential streets to the south of San Bruno Avenue West where on-street parking is permitted (for example, Cherry Avenue, Hickory Avenue, and Cedarwood Court), and results of the survey shall be submitted to the City of San Bruno. The SFPUC shall coordinate with the City of San Bruno regarding the feasibility and location of construction worker vehicle parking on residential streets.</u></p>	<u>San Bruno North site</u>
<p><b><u>Improvement Measure I-TR-B: Monitoring of Westbound Left-Turn Lane from San Bruno Avenue West onto Shelter Creek Lane</u></b></p> <p><u>At the San Bruno South site, SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), to determine whether construction vehicles traveling to the site spill back from the westbound left-turn lane onto San Bruno Avenue West, and develop strategies to reduce the potential for spillback. These strategies could include scheduling of construction vehicles to ensure arrival throughout the hour (rather than multiple trucks following each other); changes in signal timing during the nonpeak hours to provide additional green time for westbound traffic flow; requiring construction vehicles arriving via I-280 southbound to use the I-280 off-ramp at Cunningham Way; and other strategies developed with the City of San Bruno.</u></p>	<u>San Bruno South site</u>
<p><b><u>Improvement Measure I-TR-C: Coordinate On-street Parking at the Millbrae Site</u></b></p> <p><u>Coordinate with the City of Millbrae regarding construction worker vehicle parking on residential streets.</u></p>	<u>Millbrae site</u>
<p><b><u>Improvement Measure I-TR-D: Monitoring Plan for the Unsignalized Intersection of the I-280 Ramps/Cunningham Way</u></b></p> <p><u>At the San Bruno South site, the SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the unsignalized intersection of the I-280 ramps/Cunningham Way to determine whether traffic controls such as using a flagger or installing and operating a temporary traffic signal are warranted during PPSU San Bruno South construction activities.</u></p>	<u>San Bruno South site</u>



The first sentence of the second paragraph under Section 1.6, Alternatives to the Proposed Project, on page 1-99 of the Draft EIR, has been revised as follows:

The impacts of the proposed project and those of the alternatives are summarized in Table 1-~~32~~.

The numbering for the Draft EIR, Table 1-2, Comparison of Significant Impacts of the PPSU Project to Impacts of Alternatives, on pages 1-100 through 1-102 of the Draft EIR, has been revised as follows:

Table 1-~~32~~, Comparison of Significant Impacts of the PPSU Project to Impacts of Alternatives

Mitigation Measure M-TR-3: Traffic Control Plan, on page 1-27 and page 5.6-37 of the Draft EIR, has been revised as follows:

*Specific Measures for Project Sites*

- At the **San Bruno North site**, the construction contractor shall obtain an encroachment permit from Caltrans, and comply with Caltrans requirements for traffic control activities within the State right-of-way, as described in Section 3.10, Required Permits. ~~Construction worker parking on local residential streets shall be limited to 10 vehicles. The remaining workers shall park at the common staging area, and carpooling between the San Bruno North site and the common staging area shall be established.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR; there are no significant impacts associated with parking, and no evidence of such a physical impact has been provided.

**Comment ES-8: Restrict construction hours to limit noise impacts to residential neighborhoods.**

Impact NO-1 (page 1-34)

Both the San Bruno North and South sites are within residential neighborhoods. The use of vibratory rollers and pile drivers between 7 a.m. and 5 p.m. would significantly impact the adjacent residents. The City of San Bruno has allowed similar use of construction equipment only during the hours between 9 a.m. and 5 p.m. The City will enforce the same requirement and limit the use of vibratory rollers and pile drivers between 9 a.m. and 5 p.m. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

Impact NO-4 (page 1-40)

See comments for Impact NO-1. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response ES-8**

In Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, specific noise control measure d) requires that the use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. and 5 p.m. In response to the City of San Bruno's comment, Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source

Controls, on page 1-34 of Chapter 1, Executive Summary, and page 5.7-32 of Section 5.7, Noise and Vibration, of the Draft EIR has been revised as follows:

d) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. ~~to and~~ 5 p.m., except in the City of San Bruno, where such equipment shall be limited to the hours between 9 a.m. and 5 p.m.; and in the City of Millbrae, where such equipment shall be limited to the hours between 8 a.m. and 5 p.m.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 1-40 and page 5.7-46 of the Draft EIR, has been revised as follows:

b) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. and ~~5~~ 4 p.m., except in the City of San Bruno and the City of Millbrae where such equipment shall be limited to the hours between 9 a.m. and 5 p.m. and between 8 a.m. and 5 p.m., respectively.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Please see Response PD-2 for additional revisions to construction hours in the Draft EIR.

**Comment ES-9: Nighttime noise levels should be limited and performance standards should be identified as part of coordination with the city.**

Impact NO-2 (page 1-38)

Noise level during night time construction shall be limited at 60 decibels as measured at 100 feet between the hours of 10 p.m. and 7 a.m. pursuant to Section 6.16.070 of the San Bruno Municipal Code. If this requirement cannot be made, what are the performance standards and plan the construction contractor is required to comply and follow?

This should also be part of the public notification process to be developed with the City of San Bruno. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

#### **Response ES-9**

Mitigation Measure M-NO-1 includes six minimum general noise reduction elements, eight specific noise control measures, and additional measures regarding the use of back-up alarms, all of which are enumerated on the referenced pages in the Draft EIR. The performance standards, noise reduction elements, and specific noise control measures apply to both daytime and nighttime construction, as clarified below.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on pages 1-32 through 1-37 and pages 5.7-31 through 5.7-33 of the Draft EIR, has been revised to incorporate the performance standards for limiting noise levels during nighttime construction and nighttime dewatering as follows:

The noise control plan shall contain performance standards based on the more-restrictive of the 60-dBA [A-weighted-decibels]  $L_{eq}$  [equivalent continuous noise level] sleep interference threshold (applicable to nighttime construction), the 70-dBA  $L_{eq}$  speech interference threshold (for daytime construction), and the limits established in noise ordinances of San Mateo County, the Town of Colma, and the cities of San Bruno and

Millbrae. The noise control plan shall identify the applicable threshold for each project site.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Implementation of Mitigation Measure M-NO-1 would reduce nighttime noise impacts at most locations in the City of San Bruno to at or below nighttime noise thresholds. However, at some locations, the nighttime construction-related noise levels could still exceed the 60-dBA  $L_{eq}$  sleep interference threshold by up to 20 dBA. When compared to the average nighttime ambient noise levels, the mitigated noise levels would exceed the average ambient levels by up to 22 decibels (dB). As described in Note 1 in Table 5.7-14 on page 5.7-39 of the Draft EIR, "At the San Bruno North site, even with mitigation, seven residences on Cedarwood Court (1790, 1800, 1801, 1820, 1821, 1840, and 1841) and eight on Pepper Drive (763, 769, 773, 779, 783, 789, 793, and 795) would experience noise levels that exceed the sleep interference threshold." As described on page 5.7-40 of the Draft EIR, the noise levels would be significant and unavoidable with mitigation. Construction at these locations would be limited to a maximum duration of one month.

If Caltrans approves the temporary daytime closure of the right-turn-only lane on the I-280 northbound off-ramp adjacent to the San Bruno North site, nighttime construction activities would not be required and nighttime impacts at the San Bruno North site would not occur.

Please see Response ES-1 regarding the public notification process pertaining to noise.

**Comment ES-10: Removal of any tree in San Bruno requires a tree removal permit.**

Impact BI-4 (page 1-75)

Tree Removal Permit and applicable fee is required from the City of San Bruno to remove any trees within City of San Bruno. This includes any City trees, heritage trees, and private trees. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response ES-10**

As described in Section 4.2.1.1, Extraterritorial Lands, on page 4-2 of the Draft EIR, the provisions of California Government Code Section 53090 et seq. provide the SFPUC with intergovernmental immunity from the planning and building ordinances of other cities and counties. Therefore, a tree removal permit is not required for removal of trees in the SFPUC ROW. The majority of trees to be removed in San Bruno are anticipated to be in the ROW, although a few may be located on the Caltrans property at San Bruno North, which would be subject to Caltrans approval under an encroachment permit for activities at that site.

The Draft EIR describes the applicable City of San Bruno tree ordinances on page 5.14-30 under City of San Bruno Tree Ordinance. Mitigation Measure M-BI-4: Replacement of Trees to Be Removed, on page 5.14-52 of the Draft EIR, describes measures to fulfill the intent of local tree-preservation ordinances by requiring replanting of trees that are removed for construction of the project. The following text change has been made to page 3-38 of Chapter 3, Project Description, of the Draft EIR.

Section 3.10.3, Local, fourth bullet on page 3-38 of the Draft EIR, has been revised as follows:

- **Various cities** – Haul permits, encroachment permits, temporary construction easements, tree removal permits for trees outside the SFPUC right-of-way, grading permits, sewer district approvals, and leases or other agreements as needed in connection with project construction; and

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment ES-11: Project objectives need to be clarified.**

> pg 1-3: “to maintain reliability during a major seismic event.” I believe you mean AFTER a major seismic event. A pipeline conveys water. If it stops doing so reliably during a seismic event, that is for a matter of seconds. The important thing is that the pipeline not fail--leak--so that it can function after the quake.

> "to meet current seismic standards" This is vague and confusing. You are designing for a 7.9 quake. The lines need to survive a 7.9 quake. Your work should so ensure. Meeting some vague standard is not a proper goal, nor does it have meaning; there is no “current seismic standard” for a pipeline. YOU set the standard in the PEIR: survive a 7.9 quake on the San Andreas.

There is a lot of vagueness in “objectives.” The goal is for the pipelines three to survive a 7.9 quake without damage, or at least without so much damage that they must be taken out of service. “Quake of 7.9--no significant damage” would be better as an objective. (*Steve Lawrence; email, March 29, 2013*)

**Response ES-11**

The potential for damage by earthquakes is a serious threat to property and public safety. The information in the Draft EIR quoted by the commenter is accurate. If the pipelines maintain reliability *during* a major seismic event, they will not fail and will continue to function after an earthquake.

Current seismic standards are generally codified in the International Building Code, which is the basis of most state seismic codes. Because the seismic code design parameters are generic, they are also generally conservative. The seismic code includes provisions for use of a site-specific seismic study to derive structural design parameters. The site-specific studies can optimize the structural design by reducing the lateral loads and/or by reducing the seismic design category. Seismic designs which use site-specific information provide construction savings, compared to designs that use conservative code default values.

As stated in Section 5.15.2.3 of the Draft EIR, under SFPUC General Seismic Design Requirements, on page 5.15-23, “The SFPUC established the General Seismic Design Requirements (SFPUC, 2006) to implement consistent criteria for the design and retrofit of all facilities and components of the regional water system... A major earthquake is identified in the General Seismic Design Requirements as earthquakes of M 7.8 or larger on the San Andreas Fault, M 7.1 or larger on the Hayward Fault, or M 6.8 or larger on the Calaveras Fault. The design criteria are based on standard industry practices, codes and standards, but exceed these requirements for facilities that are located in a severe seismic environment and are needed to achieve water system delivery goals... Facilities needed to achieve a basic level

of service within 24 hours of a major earthquake are assigned a seismic performance class of Critical... The PPSU project would be classified as 'Critical' due to the number of components and control systems with little or no redundancy, the failure of which would result in an unacceptable level of service (G&E Engineering Systems, Inc., 2012)."

The SFPUC design consultants, Geotechnical Consultants, Inc. (GTC) prepared a Geotechnical Interpretive Report (GTC, 2011a) for the proposed project, in which they concluded that 7.9 was the appropriate design criterion to be used to meet the SFPUC objectives to withstand the ground displacements potentially caused by a fault offset: "The most likely rupture scenario is a repeat similar to the 1906 moment magnitude (M) 7.9 earthquake. Extending from the north end of the creeping zone near San Juan Bautista on the south to the northern end of the San Andreas fault off shore of Cape Mendocino, this earthquake is considered to be the maximum event for this segment of the plate boundary."

The SFPUC has therefore determined that a design earthquake of 7.9 is appropriate to meet the objective of withstanding the ground displacement potentially caused by a fault upset.

**Comment ES-12: Include a new alternative that prepares for and anticipates pipeline failure during a seismic event.**

> 1-99, alternatives. Why not have an alternative--for one or more of the lines--that involves preparing for line breakage? In the best of worlds, you are ensuring only against lines not breaking (leaking) in a quake up to 7.9 in size. That leaves the possibility that a larger quake happens, and the repaired lines break. In which case you would be better off with: staged pipe sections designed and stored in a manner so that the line may quickly be repaired after a quake damages it. You close valves, shutting off water (automatically) when the quake happens. You prepare for where the water in the line will go, minimizing damage it will cause. You prepare for rapid response: perhaps with plastic pipe (PE for example). After the quake, the line re-opens fairly quickly. Should this not be an alternative? (Slip-lining is a straw man alternative, I suspect.) (Steve Lawrence; email, March 29, 2013)

**Response ES-12**

The project's objective of withstanding the ground displacements potentially caused by a fault offset will be met by designing for a 7.9 magnitude earthquake, because this design threshold "is considered to be the maximum event" in the vicinity of the proposed project (GTC, 2011a). Therefore, by definition, the project is predicted to withstand the maximum reasonably anticipated seismic event. A greater seismic event is not reasonably anticipated, so there are no potential significant impacts identified from project failure; therefore, there is no CEQA rationale for including a new alternative, as suggested by the commenter, in this EIR.

Furthermore, the alternative proposed by the commenter is similar to the SFPUC's current Pipeline Repair and Readiness Improvement Project, which is implicitly considered in the Draft EIR under the No-Project Alternative. The Pipeline Repair and Readiness Improvements project that the SFPUC has completed entailed three phases: 1) the procurement of varied lengths and sizes of welded steel pipe and fitting for stockpiling at seven locations west of the Coast Range Tunnel; 2) the procurement and installation of a pipe

rolling facility at the Sunol Yard; and 3) the development of a pipeline repair prioritization plan, on-call emergency repair procedures and contracts, and mutual assistance agreements. This plan is in place in the event of pipeline breakage, with or without the proposed project. Therefore, the commenter's suggestion falls within the range of alternatives already analyzed, and no change to the Draft EIR is required. Furthermore, the alternative outlined in the comment would not reduce the significant environmental impacts identified in the Draft EIR.

### 3.3 Introduction and Background

#### **Comment IN-1: Key facilities of the Regional Water Systems should be described.**

1. Section 2.2.3 – Regional Water System Facilities (page 2-7)

This general description of the Regional System does not include key facilities constructed as part of the WSIP that are complete or will be operationally functional by the time this EIR is certified. For clarity, the functions of the Tesla Portal UV Disinfection Facility and Alameda Siphon No. 4 should be described. (*Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013.*)

#### **Response IN-1**

To update the description of the Regional Water system to include the functions of the Tesla Portal UV Disinfection Facility and Alameda Siphon No. 4, Chapter 2, Section 2.2.3, Regional Water System Facilities, of the Draft EIR has been revised to include the following text before the last sentence of the first full paragraph on page 2-7:

The Tesla Treatment Facility, California's largest ultraviolet (UV) water disinfection facility and the third-largest facility of its kind in the nation, consists of a 20,000-square-foot building that will use a series of UV light arrays to treat water from the Hetch Hetchy Reservoir, in Yosemite National Park in the Sierra Nevada Mountains. The facility will treat up to 315 million gallons of water per day. UV disinfection is applied as an additional treatment mechanism for the Hetch Hetchy water supply to comply with U.S. EPA's new regulation requiring a second disinfectant for all unfiltered drinking water systems, effective April 2012. At the Tesla Portal, the chlorinated Hetch Hetchy water enters the 25-mile-long Coast Range Tunnel and is conveyed west to the Alameda East Portal in the Sunol Valley, which connects the Coast Range Tunnel to the Alameda Siphons.

In Chapter 2, Section 2.2.3, Regional Water System Facilities, the following has been added after the first sentence of the second full paragraph on page 2-7:

The Alameda Siphons are three parallel pipelines that extend approximately 3,000 feet from the Alameda East Portal across the Sunol Valley and beneath Alameda Creek to the Alameda West Portal. The Alameda Siphon No. 4 Project extends approximately 3,000 feet from the Alameda East Portal across both the Calaveras Fault and Alameda Creek to the Alameda West Portal. The project consists of a 66-inch-diameter welded steel pipeline with 310 feet of a seismically-designed special trench thicker-walled pipe in the fault rupture zone, and a tunnel crossing under Alameda Creek; and a 96-inch-

diameter “blending structure,” consisting of a pipe and valve manifold near the Alameda West Portal, which will blend water from the Sunol Valley Water Treatment Plant and Hetch Hetchy, so that the existing and new Irvington Tunnels will receive a uniform quality of water.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

## 3.4 Project Description

### Comment PD-1: Existing wholesale customer turnouts should be identified.

2. Section 3.1 – Project Location (Figures 3-2 through 3-6)

Section 3.5 – Proposed Project (Figures 3-7 through 3-11)

The proposed project is identified as impacting three SFPUC water transmission pipelines – SAPL2, SAPL3, and SSBPL – at five locations on the San Francisco Peninsula. Figures 3-2 through 3-6 provide aerial photos of each of the five sites with existing facilities and proposed improvements identified. Figures 3-7 through 3-11 provide plan and profile drawings for the existing facilities and proposed improvements. For each of these figures, it is critical that all of the existing wholesale customer turnouts within the delineated project areas are identified. As currently presented, some customer service connections are identified but not all (e.g., A customer service connection has been called out on Figure 3-2 and noted in the project site narrative but not shown on the corresponding profile figure). Additionally, if a service connection needs to be relocated, it would be helpful to have the customer specifically identified on the location figure if it is a wholesale turnout and also show on the corresponding profile figure. (*Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013.*)

### Response PD-1

All customer turnouts would be replaced in their current locations (i.e. none are being relocated). Wholesale customers with turnouts that would be replaced are the following: Cal Water (Colma site), Westborough Water District (South San Francisco site), and City of San Bruno (San Bruno South site). It should be noted that the SFPUC’s Water Department operations group is coordinating these shutdowns with the wholesale customers, and that either the SFPUC would provide water via other means (i.e. a pump around strategy) or the wholesale customer would receive water from reserves or other supplies of their own.

Figures 3-2 and 3-3 of the Draft EIR show wholesale customer service connections to be replaced at the Colma and South San Francisco sites; these figures have been updated to more accurately show the scale of the turnout replacement dimensions. Figure 3-5 has been revised to show the customer service connection to be replaced. Similarly, Figures 3-7 and 3-9 through 3-10 have been revised to show the customer service connections to be replaced (plan and profile views). The revised figures are provided in this document in Section 4.2, Figure Revisions.

The customer service connection replacements for Colma and South San Francisco sites are described on page 3-16 of the Draft EIR under Section 3.5.1, Colma Site, and Section 3.5.2,

South San Francisco Site, respectively. Section 3.5.4, San Bruno South Site, on page 3-19 of the Draft EIR has been revised as follows:

Open-trench construction techniques would be used; a portion of the pipeline would be installed at a lower elevation than the existing pipeline, as shown on Figure 3-10. The new alignment of the pipeline would be at depths similar to those described above for SAPL2. A normal trench would be used for the length of the new pipeline. In addition, the project would include replacement of the existing pipe and valves connecting the customer service connection, approximately 65 feet south of Whitman Way.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment PD-2: Limit construction hours.**

The project site is adjacent to a quiet residential neighborhood and therefore construction noise is a major concern. We recommend that construction activities be limited to Monday through Friday between the hours of 8:00 AM and 6:00 PM. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)

Section 3.8.9 Construction Schedule and Equipment (page 3-36)

Typical construction activities shall be between 8 a.m. and 5 p.m. Monday through Friday. Also, revise the hours shown on pages 5.6-14, 5.6-15, and 5.6-18 accordingly. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

The use of vibratory rollers and pile drivers shall be limited to the hours between 9 a.m. and 5 p.m. Revise the hours listed in the Impact AE-2 discussion on pages 5.3-23 and 5.7-32. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-2**

Page 3-36 in Chapter 3, Project Description, of the Draft EIR notes that the proposed project's weekday construction workday would begin primarily at 7:00 a.m. In response to the City of Millbrae's and City of San Bruno's request, the SFPUC agrees to start the physical activities associated with project construction at 8:00 am, although the construction crew may still arrive at 7:00 a.m. to meet, organize, and prepare for active construction activities. The SFPUC also agrees to delay the use of vibratory rollers and pile drivers until 9 a.m., and finish haul trips by 4:30 p.m. (see Comment PD-3, below) at project sites in the City of San Bruno, per the city's request.

As described in Section 3.8.9 in Chapter 3 of the Draft EIR, weekend work may be required on a limited basis, although the exact nature of such work is not currently known. Weekend work may be necessary for dewatering of pipelines. Additionally, although construction activities would not typically occur on weekends, they may be required in certain cases for the contractor to keep construction on schedule. Weekend work would comply with applicable city noise ordinances, including through implementation of Mitigation Measure M-NO-3a: Limit Hours of Construction at Colma Site and Mitigation Measure M-NO-3b: Limit Hours of Construction at Millbrae Site, on pages 5.7-42 and 5.7-43 of the Draft EIR, and as revised below.



The text on page 5.3-23, which is noted by the commenter, does not reference construction hours and it is assumed the commenter's reference to the page is a typographical error.

The following revisions to the project description and corresponding revisions to subsequent sections of the Draft EIR, as well as mitigation measures identified in the Draft EIR, have been made to reflect these changes.

Section 3.8, first sentence of the first paragraph on page 3-36:

Daytime construction activities would occur primarily during weekdays, from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

On page 5.2-10, the second sentence of the second full paragraph has been revised as follows:

Work would take place primarily on weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

On page 5.3-29, the first sentence of the last paragraph has been revised as follows:

As discussed in Section 3.8.9 in Chapter 3, Project Description, the majority of construction activities would occur on weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.; ~~however, w~~ Weekend construction work may also be necessary.

On page 5.6-14, the first sentence of the second full paragraph has been revised as follows:

Construction of the proposed project is estimated to require a total of 12 months to complete, and project construction would generally occur on weekdays between 7 a.m. and 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

On page 5.6-14, the sixth sentence of the last paragraph has been revised as follows:

Trucks delivering equipment and materials to the project area from offsite locations, and hauling excavated materials from the project area to offsite locations, would generally travel on weekdays between 7 a.m. and 5 p.m., with haul trips ceasing at 4:30 p.m. in San Bruno.

On page 5.6-15, note one in Table 5.6-7, A.M. and P.M. Peak Hour Construction Vehicles by Site, has been revised as follows:

<sup>1</sup> Construction activities would generally occur between 7 a.m. and 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

On page 5.7-26, the first sentence of the third paragraph has been revised as follows:

As described in Section 3.8.9, Construction Schedule and Equipment, construction activities would occur primarily during weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

Mitigation Measure M-NO-3a: Limit Hours of Construction at Colma Site, on page 1-38 and page 5.7-42, has been revised as follows:

This mitigation measure applies to the Colma site. Any construction work conducted within the Town of Colma shall be limited to the hours established in the Town noise ordinance (weekdays 7:00 a.m. to 8 p.m. and ~~Saturdays~~ weekends 10 a.m. to 6 p.m.), unless determined otherwise by the Colma building official.

Mitigation Measure M-NO-3b: Limit Hours of Construction at Millbrae Site, on page 1-38 and page 5.7-43 has been revised as follows:

This mitigation measure applies to the Millbrae site. Except for dewatering activities, any construction work conducted within the City of Millbrae shall be limited to the following hours: weekdays 8 a.m. to 6 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m. ~~established in the which is in compliance with the City noise ordinance (weekdays 7:30 a.m. to 7 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m.).~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Please see Response ES-8 for additional revisions to construction hours in the Draft EIR.

Table RTC 3-3 on the following page summarizes the daytime construction hours that would result from these changes to the project description in the Draft EIR, and from implementation of the mitigation measures identified in the Draft EIR.

**Comment PD-3: Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.**

2. The access to the project site will primarily be through an existing easement between 1094 Ridgewood and 1100 Ridgewood and the City of Millbrae's trail. The City will issue a Hauling Permit and designate a dedicated haul route for construction traffic. A Hauling Permit is required. Additionally, pre-construction conditions of designated haul route shall be surveyed and recorded with the City prior to construction. Once construction is completed the City will survey the post construction haul route pavement conditions and if necessary repair is needed to restore pavement conditions to the pre-construction conditions. This shall also apply to the trail that will be used as access. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)
6. Encroachment permit is required. Additionally, an inspection deposit will also be required and the amount will be determined once the construction phase of the project is more defined. Please direct your contractor to Millbrae Public Works located at 621 Magnolia Ave., Millbrae or (650) 259-2339 for encroachment permit process and associated fees. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)

**Table RTC 3-3  
Daytime Construction Hours By Type of Construction Activity<sup>1</sup>**

<b>Project Site</b>	<b>Arrive on Site<sup>2</sup></b>	<b>Begin Active Construction (Weekdays)<sup>3</sup></b>	<b>Begin Active Construction (Weekends)<sup>3</sup></b>	<b>Pile Drivers and Vibratory Hammers</b>	<b>Finish Haul Truck Trips</b>	<b>End Construction</b>
Colma	7 a.m.	7 a.m.	10 a.m.	See Begin Active Construction	5 p.m.	5 p.m.
South San Francisco <sup>4</sup> (and common staging area)	7 a.m.	7 a.m.	7 a.m.	See Begin Active Construction	5 p.m.	5 p.m.
San Bruno (North and South)	7 a.m.	8 a.m.	8 a.m.	9 a.m.	4:30 p.m.	5 p.m.
Millbrae	7 a.m.	8 a.m.	8 a.m./9 a.m. <sup>5</sup>	See Begin Active Construction	5 p.m.	5 p.m.

## Notes:

<sup>1</sup> Excludes dewatering activities in the cities of San Bruno and Millbrae that would be continuous for 1 day up to 2 weeks. Also excludes nighttime work (from 10 p.m. to 7 a.m.).

<sup>2</sup> Construction crew arrives on site to meet, organize, and prepare for active construction activities.

<sup>3</sup> Physical activities associated with project construction, i.e. equipment usage, materials and/or spoils transport.

<sup>4</sup> Utility and street repair work is exempt from the City of South San Francisco Noise Ordinance (Section 8.32.050 [c]). A portion of the site is located in unincorporated San Mateo County; however, no construction hour limits would apply, as described on page 5.7-42 of the Draft EIR.

<sup>5</sup> Saturday work would start at 8 a.m. Sundays and holidays work would start at 9 a.m.



and the Town of Colma, pavement conditions will be restored to pre-construction conditions. It is also noted that an inspection deposit will also be required by the City of Millbrae. It is further noted that a memorandum of agreement to restore pavement conditions along the approved haul routes, and to specify limits of roadway reconstruction on San Bruno Avenue West and Whitman Way, will be required; such a memorandum will include pre-and post-construction pavement surveying.

The SFPUC confirms that only clean water will be discharged to the City of San Bruno's storm drain system, open channels, or natural creeks. As stated in Response HY-2, the SFPUC will handle discharges as follows: effluent will be 1) discharged to a nearby sanitary sewer; 2) used onsite for dust control or for other uses; or 3) discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC will implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. Prior to making any discharges to the sewer system, SFPUC will obtain a sewer connection permit for the City.

If, during project construction, damage is incurred by the driveway at Peninsula High School referred to by the commenter, or by other roadways within the project area, the SFPUC will repair the damage, as described in Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures, Mitigation Measure M-TR-3: Traffic Control Plan, the fourth bullet on page 5.6-37: "Roadway rights-of-ways shall be repaired or restored to their original conditions or better upon completion of construction."

Please see Surface Restoration and Revegetation in Section 3.8.1.1, Common Construction Elements for Pipeline Replacement, on pages 3-24 and 3-25 of the Draft EIR, for information regarding trail restoration; as described therein, trees generally would not be replanted in the SFPUC ROW because the roots could damage the pipelines.

The comment regarding grading permits and tree removal permits from the City of San Bruno is noted. Please see Response ES-10 for applicable revisions to the Draft EIR.

As described in Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures, Mitigation Measure M-TR-3: Traffic Control Plan, the second bullet on page 5.6-37: "To the maximum extent feasible, truck trips (i.e., haul trucks and heavy construction equipment) shall be scheduled outside of the a.m. (7 to 9 a.m.) and p.m. (4 to 6 p.m.) peak commute periods." In addition, the SFPUC agrees to finish haul trips by 4:30 p.m. at project sites in the City of San Bruno, per the city's request. Please see Response PD-2, above, for revised Draft EIR text.

The SFPUC or its contractor will submit construction plans to the Town of Colma prior to construction, and will be responsible for obtaining all required agency permits, as described in Section 3.10, Required Permits, on pages 3-36, 3-38, and 3-39 of the Draft EIR.

The Town of Colma will be provided with the opportunity to review and comment on the Storm Water Pollution Prevention Plan (SWPPP).

Permits and reports that may be required in connection with the proposed project are identified in Section 3.10, Required Permits, beginning on page 3-36 of the Draft EIR. In response to the RWQCB comment, the following text change has been added to Section 3.10.2, State.

Section 3.10.2, State, a new second sentence has been added to the second bullet:

- **San Francisco Bay Regional Water Quality Control Board** – Compliance with the SFPUC’s existing NPDES permit for planned, unplanned, and emergency discharges from the drinking water transmission system. Potentially, a Report of Waste Discharge if the Project impacts waters of the State;

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment PD-4: On-street parking in residential areas should be prohibited.**

4. Parking on residential streets will be prohibited during construction. Contractor shall make arrangements to provide parking for its workers at an off site location in order to minimize parking impact to our residents. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)

**Response PD-4**

Analysis of construction parking has been provided in the Draft EIR for information only. Although no significant parking impacts were identified in the Draft EIR, the SFPUC will, in response to this comment, prepare a pre-construction parking survey to identify the parking demand during the time frames when construction vehicles are proposed to park on residential streets in Millbrae, and will coordinate a parking plan with the City of Millbrae as part of a memorandum of agreement.

The parking information for the Millbrae site described under Impact TR-1, on page 5.6-32 of the Draft EIR, has been revised to include the following text after the last paragraph:

Although the PPSU project would not have significant parking impacts, the following improvement measure has been included to address concerns related to on-street construction worker parking raised during the Draft EIR public review period.

**Improvement Measure I-TR-C: Coordinate On-street Parking at the Millbrae Site**

Coordinate with the City of Millbrae regarding construction worker vehicle parking on residential streets.

The Draft EIR has been revised to include the preceding improvement measure in the new Table 1-2, Summary of Improvement Measures for Proposed Project, on page 1-99 (see Table RTC 3-2 in Response ES-7 above):

Mitigation Measure M-TR-3: Traffic Control Plan, on pages 1-29 and 1-30 and page 5.6-38 of the Draft EIR has been revised as follows:

- At the **Millbrae site**, the SFPUC or the construction contractor shall coordinate with the schedule of schools to minimize impacts on school operations to the maximum extent feasible. At the Millbrae site, to the maximum extent feasible, construction haul trips shall not be conducted prior to 9 a.m. or after 3 p.m. when children are traveling to and from the Meadows Elementary School and the Glen Oaks/Millbrae Montessori School. Similarly, if determined appropriate by the school administrators, the SFPUC or the construction contractor shall provide traffic control officers at the

intersections of Helen Drive/Larkspur Drive (Intersection #9) near the Meadows Elementary School, and Santa Margarita Avenue/Capuchino Drive (Intersection #11) near the Glen Oaks/Millbrae Montessori School.

If sidewalk closures are required on Ridgewood Drive, pedestrian detour routes shall be provided. ~~Construction worker parking shall be accommodated on street.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment PD-5: Describe the work that is required for the rear yard of 1840 Cedarwood Court and how the property owner will be approached.**

Section 3.1.3 San Bruno North Site

It is mentioned that portion of the stabilization work would extend under the rear yard of 1840 Cedarwood Court (page 3-7). How will the SFPUC approach the property owner/resident and what will be required? (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-5**

The portion of the stabilization work for SAPL2 that would extend under the rear yard of 1840 Cedarwood Court would be located in the existing tunnel, as described on page 3-16 of the Draft EIR. In the tunnel, grout would be injected to fill the void under the pipeline, or pipe supports would be installed. Two pits would be excavated above the tunnel to allow access, and portions of the tunnel roof would be removed. Shown on Figure 3-4 on page 3-6 of the Draft EIR, the access pits would be approximately 10 feet wide by 10 feet long; neither pit would be located under the rear yard of 1840 Cedarwood Court.

Improvements to work areas or access roads that are necessary for safe construction operations are required, and will be detailed in the construction contract between the SFPUC and the contractor. Once a preliminary solution is identified, the SFPUC Real Estate ROW Division will meet with individual property owners to discuss each party's real estate rights, and the expected impacts from this project. The SFPUC intends to outline and reach written agreement with property owners on these issues before the construction contract is opened for bid.

**Comment PD-6: Describe the fencing and security for the open trenches during construction.**

Section 3.8.1.1 Common Construction Elements for Pipeline Replacement

Under the topic of Trench Excavation and Shoring, it is mentioned that open trenches in areas other than public right-of-way will be fenced off (page 3-24). Please elaborate the type of security fencing and how it will prevent access to the deep opened trench/pit. The concerned area includes the San Bruno Avenue North site and the steep slope next to the outside staircase at the Park Plaza Apartment building. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

### Response PD-6

Open trenches would typically be covered at the end of the work day with steel plates, and surrounded by chain-link fence panels. Chain-link fence panels are free-standing and are supported by panel stands, painted in high visibility safety orange paint, and made of metal, so they are sturdy yet weigh much less than fence panels held in place by concrete blocks. Fences are typically 6 feet in height, and would secure the trenches and work area.

Chapter 3, Project Description, Trench Excavation and Shoring, on page 3-24 of the Draft EIR has been revised as follows:

During nonwork hours, open trenches within the roadways, or as warranted along other areas with deep trenches, would be covered with steel plates; ~~and trenches in other areas~~ and work areas would be fenced off unless they are in the roadway. Prior to pipe installation, trenches would be prepared by installing materials that support the pipeline, such as sand or polystyrene slabs.

This revision does not change the analysis or conclusions presented in the Draft EIR.

### Comment PD-7: Describe unpermitted structures and process for notification of property owners, as well as slope stabilization and replanting post-construction.

Under topic of Surface Restoration and Revegetation (page 3-25), it is mentioned that unpermitted structures would not be replaced. Have any unpermitted structures been identified at the San Bruno North and South sites? How will the owners of these unpermitted structures be notified and informed? In addition, vegetation that will help to stabilize the slope needs to be considered for the slope adjacent to the Park Plaza Apartment. Top soil with normal native plant seed mix would not be sufficient. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

### Response PD-7

Encroachments within the SFPUC's ROW include landscaping and unpermitted structures. In the City of San Bruno, unpermitted structures that have been identified to date include:

- At San Bruno South, within the Shelter Creek Condominiums – portion of Lot B parking lot, curb, gutters, fencing, trash enclosure, and small retaining wall.
- At San Bruno North, identified unpermitted structures include the fencing at 1840 Cedarwood Court.

Prior to construction, a complete survey of the SFPUC ROW will be completed, and other unpermitted structures may be identified.

The SFPUC's ROW Division will meet with individual property owners to discuss each party's real estate rights, and the expected impacts from this project. The SFPUC's intent is to outline and reach written agreement with property owners on these issues before the construction contract is opened for bid.



As described in Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, on page 5.16-16 of the Draft EIR, seven erosion and sedimentation measures would be implemented to stabilize the construction areas, including the slope adjacent to the Park Plaza Apartments at the San Bruno South site, as applicable.

Measures pertaining to vegetation include:

- Preserve existing vegetation in areas where no construction activity is planned, or where construction activity will occur at a later date.
- Stabilize and revegetate disturbed areas as soon as possible after construction by planting or seeding and/or using mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material).

Specific post-construction best management practices (BMPs) include:

- Revegetate all temporarily disturbed areas as required after construction activities are completed.
- Remove any remaining construction debris and trash from the project area and staging areas upon project completion.
- Phase the removal of temporary BMPs as necessary to ensure stabilization of the site.
- Maintain post-construction site conditions to avoid any unintended drainage channels, erosion, or areas of sedimentation.
- Correct post-construction site conditions as necessary to comply with the SWPPP and any other pertinent RWQCB requirements.

These and other measures within Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan would control erosion and sedimentation.

**Comment PD-8: Comments regarding Impact TR-1 also apply to San Bruno Avenue West lane closure.**

Under topic of Access Pits and Tunnel Work at San Bruno North Site (page 3-25), it is mentioned that one of the access pits may be on the sidewalk and into the right-hand lane of eastbound San Bruno Avenue West, which will require lane closure during construction. City's comments for Impact TR-1 will also apply for this section. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-8**

This comment regarding lane closure on San Bruno Avenue West is acknowledged. Please see Response ES-3 for a response.

**Comment PD-9: Before discharging water free of chemicals to storm drains, capacity must be verified.**

Water free chemical could only be discharged to City of San Bruno's storm drain system after verifying the capacity of the storm system.

Section 3.8.5 Dewatering (page 3-30)

Water free chemical could only be discharged to City of San Bruno's storm drain system after verifying the capacity of the storm system. This requirement applies to water discharged during shutdown, hydrotesting, and post disinfection, and dewater of groundwater, rainwater or other water that enters the trenches and pits. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-9**

See Response HY-2. Dewatering effluent, in order of priority, will be 1) discharged to a nearby sanitary sewer once the capacity of the system is verified with the appropriate agency; 2) used onsite for dust control or for other uses; or 3) discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC will implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body.

**Comment PD-10: Lane closure at Whitman Way will create significant traffic delays.**

Section 3.8.7 Site Access and Construction Vehicle Routes (page 3-32)

Pipeline replacement work at San Bruno South Site will cross Whitman Way. The Draft EIR mentions that one travel lane will be closed at a time for up to 21 days. City of San Bruno is extremely concerned that access to the east part of the City will be delayed significantly. The City prefers two-way traffic be maintained throughout construction along Whitman Way. At the end of each construction day, the excavated area should be steel plated and secured. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-10**

This comment regarding lane closures on Whitman Way is acknowledged. Please see Response ES-5 for a response.

**Comment PD-11: A third party geotechnical engineer will be required.**

The City will also require SFPUC to provide a third party geotechnical engineer that provides field inspection and oversight on behalf of the City. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response PD-11**

This comment does not address the adequacy or accuracy of the EIR, and this response is provided for information purposes only. Geotechnical studies completed for the PPSU project were performed by a third party (GTC), and the need for third-party field inspections was not identified. The SFPUC will discuss this request with the City of San Bruno during the memorandum of agreement negotiations.

**Comment PD-12: Provide improved landscaping and maintenance of the SFPUC ROW.**

*Landscaping and Maintenance:* During the scoping process, we requested a discussion of any plans that the SFPUC has to provide landscaping after the project is completed and the schedule for maintenance. Currently, the easement contains weeds and grass which is mowed periodically. We would like the project to include provisions for improved landscaping and maintenance since the easement bisects our Serramonte commercial corridor. (Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013)

**Response PD-12**

Chapter 3, Section 3.8.1.1, Surface Restoration and Revegetation, page 3-24, notes that, "Topsoil would be replaced in disturbed areas, which would be re-vegetated with native plant seed mix. The ROW would generally be returned to pre-construction conditions. However, in accordance with the SFPUC's Right-of-Way Integrated Vegetation Management Policy (SFPUC, 2007a), trees generally would not be replanted along the pipeline because their roots could damage the pipeline." This statement accurately describes the SFPUC's obligation for landscaping after the active construction phase has been completed. Improved maintenance or landscaping is not required.

**Comment PD-13: Provide greater detail regarding the retaining wall proposed along the rear property line of 1094 Ridgewood Drive.**

The Draft EIR does not provide adequate information about the retaining wall that is being proposed. We have several questions regarding this retaining wall's design and construction. The Draft EIR states that the retaining wall is to be permanent wall with 10' footings without stating the varying dimensions of each footing. Will the proposed retaining wall conform to Millbrae's building code. What are the length, width, and height of the retaining wall if measured from the grade at the face of the wall to its top? During the wall's construction will the excavation site be back-filled, compacted, and reinforced. What type of drainage system will be installed within? In addition, will the retaining wall's drainage system connect to the existing City of Millbrae's concrete v-ditch channel? Who is responsible for maintaining the retaining wall after it is installed by the SFPUC. What is the proposed installation date for installing the retaining wall? (Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013)

**Response PD-13**

The proposed schedule for work at the Millbrae site is mid-April through mid-July 2015, as shown on Figure 3-12, Construction Phasing, in Chapter 3 of the Draft EIR.

A permanent retaining wall behind 1094 Ridgewood Drive has been determined not to be necessary.

The fourth bullet under Millbrae Site, on page 3-33 of the Draft EIR, has been revised as follows:

- For access through the SFPUC ROW from Ridgewood Drive, existing small structures, fences, landscaping, and other encroachments would be removed from the side yards of 1100 and 1094 Ridgewood Drive prior to commencement of construction. ~~A permanent retaining wall with approximately 10 foot footings would be constructed under the existing back yard fence at 1094 Ridgewood Drive to shore~~

up the slope prior to excavation of the pipeline. During construction, the existing grade behind 1094 Ridgewood Drive would be maintained through an engineered shoring system. A few sections of the existing fence may be temporarily removed during construction. Following the replacement of the pipeline, the grade and fence would be returned to existing conditions.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment PD-14: Identify when the trees at Millbrae site will be marked for removal.**

The Draft EIR fails to address when the approximately 300 trees identified for removal will be marked with paint and or numbered prior to removal, as per the Integrated Vegetation Management Policy section 13.002-2.0. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

**Response PD-14**

The proposed schedule for tree removal at the Millbrae site as shown on Figure 3-12, Construction Phasing, in Chapter 3 of the Draft EIR, is approximately October through November 2015. As shown in Table 3-5, Construction Duration at Each Site, on page 3-34 of the Draft EIR, tree removal at the site would span approximately 1.5 months. Trees would likely be marked approximately 2 weeks prior to removal.

## 3.5 Overview/Cumulative Projects

**Comment CU-1: Update cumulative project list.**

3. Table 5.1-1 – Cumulative Project List

The two SFPUC WSIP projects listed in the table (Regional Groundwater Storage and Recovery, Harry Tracy Water Treatment Plant-Long Term Improvements) should be updated as needed in the Final EIR to reflect any construction schedule changes that may arise from actions to be taken by the SFPUC Commission on the proposed changes to the WSIP (dated March 22, 2013). For example, the proposed construction completion date for the Harry Tracy Water Treatment Plant-Long Term Improvements project is June 30, 2015. (*Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013*)

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Section 5.1.3 List of Relevant Projects

Construction status of the following projects shall be reflected on Table 5.1-1 (page 5.1-6)

- 599 Cedar Avenue – Construction is currently underway. Two of the 14 single-family homes have not been completed.
- Parkside Intermediate School Classroom Buildings Replacement – Construction completed.

Add the following projects:

- Pacific Gas and Electric (PG&E) is proposing to upgrade one of its electric substation located at 635 Pepper Drive, San Bruno, CA, which is near the San Bruno North Site. Confirm project status and construction schedule with PG&E.

- The City of San Bruno is scheduled to begin its slurry seal project in May 2013. Streets included in this project that are near the San Bruno North and South sites are Whitman Way, Masson Avenue, Princeton Drive, San Bruno Avenue West, Bayhill Drive, Kains Avenue, and Acacia Avenue.
- The City also planned to begin its street rehabilitation and reconstruction project in August 2013. Streets included in this project that are near the San Bruno North and South sites are Whitman Way, Markham Avenue, and Park Avenue.
- 1250 Grundy Lane – The San Francisco Police Credit Union project. Project is currently in concept design stage. Construction is tentatively scheduled at the end of 2014.
- New Recreation Building at the Crystal Springs Terrace-Crystal Springs Terrace is located across from the Harry Tracy Water Treatment Plant (HTWTP) on Crystal Springs Road in City of San Bruno. The construction schedule has not been scheduled, but the expected truck traffic route would be similar to the San Bruno South site and the HTWTP project. Traffic impact would be more significant than described if three of these projects all overlap. (*Klara A. Fabry, City of San Bruno, Letter, April 29, 2013.*)

#### **Response CU-1**

Per CEQA Guidelines Section 15125, the environmental setting is considered to be the physical environmental conditions in the vicinity of the project, as they exist at the time of the notice of preparation. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The Notice of Preparation (NOP) for the PPSU project was issued by the Planning Department on November 9, 2011. Not only is the environmental setting for each resource analyzed in the Draft EIR considered to be the physical environmental conditions at the time the NOP was issued, but also, for the purposes of the cumulative analysis provided in the Draft EIR, the list of cumulative projects was developed at the time the NOP was issued.

As described in Section 5.1.3.1, Approach to Cumulative Impact Analysis, on page 5.1-4 of the Draft EIR, factors used to determine an appropriate list of projects to be considered in cumulative analysis include similar environmental impacts, geographic scope and location, and timing and duration of implementation, as described therein.

Specifically, as described in Section 5.1.3.2, List of Relevant Projects, on page 5.1-5 of the Draft EIR, “the list of projects was developed through: review of online information from CEQAnet; review of available information on the websites of the jurisdictions in which the project sites are located; personal communications with the planning departments of these cities; review of City and County of San Francisco information regarding planned SFPUC projects; personal communications with SFPUC staff regarding the project schedules for planned projects in the PPSU project vicinity; review of other agency websites, including the California Department of Transportation and the Pacific Gas and Electric Company; and review of recent environmental documents for nearby projects. The initial list of projects was then narrowed to focus on planned and potential projects within the general vicinity of the PPSU project sites, including the project construction access routes, and on projects having tentative construction schedules that could overlap with construction of the PPSU project.”

The comments regarding existing projects on the cumulative list as well as potential new projects are addressed below. The changes suggested by the commenters would not substantively alter the PPSU cumulative impacts analysis provided in the Draft EIR, as described below.

- **Regional Groundwater Storage and Recovery project.** There has been no change in the construction schedule for the Regional Groundwater Storage and Recovery project (SFPUC, Notice of Public Hearing, Notice of Posting for Consideration of Revisions to the SFPUC, WSIP [March 22, 2013]) from that noted in Table 5.1-1, Cumulative Project List, on page 5.1-6 of the Draft EIR.
- **Harry Tracy Water Treatment Plant Long-Term Improvements project.** As noted by the commenter, the completion date for the HTWTP Long-Term Improvements project has changed from March 2015 to June 30, 2015 (SFPUC, 2013). With this change in the HTWTP schedule, PPSU construction activities at the Millbrae site would overlap with the construction activities at the HTWTP. This is in addition to the PPSU activities already described in the Draft EIR as overlapping with the HTWTP project, which include the PPSU tree removal activities at the Millbrae site and the construction activities at the San Bruno South site. When considered in combination with the PPSU project construction activities, the extension of the HTWTP construction activities could potentially increase cumulative noise and traffic impacts; however, as described below, the level of significance of cumulative construction impacts would not change.

The PPSU project noise would not combine with the noise associated with the HTWTP project to exceed the speech interference threshold; construction-related noise levels at the Meadows Elementary School and residential receptors along Helen Drive would remain at least 10 dB lower than the speech interference threshold, as described for the tree removal activities in the second full paragraph on page 5.7-50 of the Draft EIR.

In addition to the potential for overlap of construction access routes to the San Bruno South site and the HTWTP project at the I-280 ramps at San Bruno Avenue West and at Cunningham Way, described on page 5.6-40 of the Draft EIR, the extension of the HTWTP schedule would result in overlap of construction access routes with the PPSU Millbrae Site at Helen Drive and Larkspur Drive (Intersection #9). The unsignalized intersection of Helen Drive/Larkspur Drive (Intersection #9) would provide construction traffic access to and from I-280 for both projects. The worst approach (i.e., southbound) at this intersection is expected to operate at LOS C during the a.m. peak hour and LOS B during the p.m. peak hour under existing conditions without the PPSU project. Project-level analysis indicates the HTWTP would not alter the LOS at this Intersection #9 during construction (SF Planning, 2010). The project-level analysis of PPSU construction provides the same conclusion, as shown on Table 5.6-9, on page 5.6-19 of the Draft EIR. Therefore, the combined construction traffic from both the PPSU and HTWTP projects would not be expected to substantially degrade the LOS for this approach; because operations would remain better than LOS E or LOS F, there would not be a significant impact. Furthermore, construction of the PPSU project would add 14 truck trips (seven inbound and seven

outbound) and up to 18 inbound construction worker trips to this intersection during the a.m. peak hour; and 14 truck trips (seven inbound and seven outbound) and up to 18 outbound construction worker trips during the p.m. peak hour. This would not make a cumulatively considerably contribution to any cumulative impact (i.e., no change to the LOS would result at this Intersection #9, as shown on Table 5.6-9 of the Draft EIR). Therefore, the overlapping traffic associated with the two projects would not result in additional cumulative traffic impacts, beyond the cumulative impacts already described for the project, which were determined to be less than significant with mitigation.

- **599 Cedar Avenue.** As noted by commenter, construction of this project is currently underway, and two of the 14 single-family homes remain to be built. Because construction-related impacts associated with constructing the two remaining homes would be less than impacts associated with constructing all 14 homes, the potential for cumulative impacts, in combination with the PPSU project, would likely be reduced. Therefore, with this change in the 599 Cedar Avenue project schedule, the analysis provided in the Draft EIR is conservative, because actual cumulative impacts would be reduced.
- **Parkside Intermediate School Classroom Buildings Replacement.** As noted by the commenter, project construction has been completed. With this change in the construction schedule, school construction would not contribute to cumulative impacts in combination with the PPSU project.
- **PG&E electric substation upgrade at 635 Pepper Drive.** The upgrade to PG&E's electric substation near 635 Pepper Drive in San Bruno would not overlap with the construction of the PPSU project. The PG&E station upgrade began in February 2013, and the majority of the work is planned to be completed by the summer of 2013 (Kingsbury, 2013). This work entails substation equipment upgrades, including the installation of a new control building, the installation of circuit breakers, voltage regulators, and switching equipment to improve capacity and service reliability. Limited nighttime work is planned as part of the project (PG&E, 2013; Kingsbury, 2013). As described above, this PG&E project would not coincide in timing with the construction effects of the PPSU project, and would not contribute to cumulative impacts in combination with the PPSU project.
- **City of San Bruno slurry seal and street rehabilitation and reconstruction projects.** As noted by the commenter, slurry seal projects in the PPSU project vicinity would be located on Whitman Way, Masson Avenue, Princeton Drive, San Bruno Avenue West, Bayhill Drive, Kains Avenue, and Acacia Avenue in the City of San Bruno. The work generally includes, but is not limited to, sealing cracks; repairing spalls and potholes; repairing pavement base; placing polymer modified slurry seal over existing pavement streets; off-hauling and disposing excavated and waste material; providing temporary traffic and pedestrian control; providing construction area signs; providing dust control measures; removing traffic pavement striping and markers; and installing temporary and permanent pavement markings, stripes, words, and arrows (City of San Bruno, 2013c). This work is planned to occur on

various start dates: 2013, 2014, 2015, and 2016 (City of San Bruno, 2013c). Because the timing of this work in the project vicinity does not overlap with proposed PPSU project activities at San Bruno North or South (Tseng, 2013a), it would not coincide in timing with the construction effects of the PPSU project, and would not contribute to cumulative impacts in combination with the PPSU project.

Street rehabilitation and reconstruction projects on Whitman Way, Markham Avenue, and Park Avenue in the city of San Bruno entail the repair and preventative maintenance of local, collector, and arterial streets, based on street conditions identified through the use of the City's Pavement Management Program (City of San Bruno, 2013b). As identified by the commenter, these projects have a scheduled start date of August 2013 (Fabry, 2013) and would be completed before PPSU project construction activities. Because this project would not coincide in timing with the construction effects of the PPSU project, it would not contribute to cumulative impacts in combination with the PPSU project.

- **San Francisco Police Credit Union project.** This new office building proposed for 1250 Grundy Lane would serve as the headquarters for the San Francisco Police Credit Union. Currently the site is developed, with a vacant TGI Friday's Restaurant (City of San Bruno, 2013a). As noted by the commenter, the project is currently undergoing environmental review, and construction is tentatively scheduled for the end of 2014.

Construction of the San Francisco Police Credit Union may overlap with construction activities at the PPSU San Bruno North and San Bruno South sites, depending on the actual construction start date of the San Francisco Police Credit Union project. The San Francisco Police Credit Union project would be approximately 0.5 and 1 mile east of the San Bruno North and San Bruno South sites, respectively, and it is possible that the projects may share construction access routes from I-280. Due to the limited duration of the potential overlap with the San Bruno North site (i.e., about 1 month), multiple access routes for the San Bruno South site (i.e., access to and from I-280 via ramps at San Bruno Avenue West and at Cunningham Way), and multiple alternative access routes for the San Francisco Police Credit Union project that do not coincide with the PPSU access routes (e.g., El Camino Real and I-280), it is anticipated that the contribution of the PPSU project to the cumulative construction impacts (i.e., between 1 and 30 construction trucks per hour destined to and from the San Bruno North and San Bruno South sites via I-280) would be both temporary and minimal. Similarly, traffic impacts during operation of the San Francisco Police Credit Union project would not be cumulatively significant if combined with PPSU construction activities, due to the distance from the PPSU project site and the limited amount of traffic typically generated during operation of this type of land use. Because of the distance from the PPSU project and the limited intensity of development proposed at the San Francisco Police Credit Union project site, the analysis of cumulative impacts related to all other environmental topics addressed in the Draft EIR would not change, regardless of whether the San Francisco Police Credit Union project is implemented.



- New Recreation Building at the Crystal Springs Terrace-Crystal Springs Terrace Apartments.** The Crystal Springs Terrace Apartments Recreation Building and Residential Units (located at 2000 Crystal Springs Road, San Bruno) would entail constructing a new recreation and leasing building at the south end of the apartment complex. The existing recreation building will be converted into four new residential units and a new parking area with 11 new spaces (City of San Bruno, 2013b). Because construction is planned to be completed by January 2014 (Gauss, 2013), there would be no overlap between the construction of this project and the PPSU project construction. Because the effects associated with activities of the Crystal Springs Terrace Apartments Recreation Building and Residential Units project (e.g., short-term construction) would not coincide in timing with the construction effects of the PPSU project, this project would not contribute to cumulative impacts in combination with the PPSU project.

Therefore, as described above, the changes suggested by the commenters would not change the cumulative impacts analysis provided in the Draft EIR.

### 3.6 Land Use and Land Use Planning

#### **Comment LU-1: Extend public notification boundaries and develop an agreed notification process with City of San Bruno and Town of Colma.**

Section 5.2.3.4 Construction Impacts and Mitigation Measures

Mitigation Measure M-LU-1a – Notice of Construction Activities:

The public notification should be beyond the immediate construction zones. This shall be part of the public notification process to be developed with the City of San Bruno.

Under the Mitigation Measure M-LU-1b – Minimum 2-week Notice of Construction Activities to Homes with Significant Unavoidable Noise Impact:

This shall be part of the public notification process to be developed with the City of San Bruno. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

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*Mitigation Measure M-LU-1a: Notice of Construction Activities.* We appreciate efforts to provide for notification prior to construction. It should be noted that Home Sweet Home is currently un-occupied and may not require notification. There is an apartment complex to the north of the project site owned by the town named Creekside Villas. There are residential units in front of Kohl's to the East. Notification to these individuals should be included. (*Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013*)

#### **Response LU-1**

This comment regarding public notification boundaries is acknowledged. Please see Response ES-1 for a response.

In response to the Town of Colma's request, the following text change to include additional notices to sensitive receptors and affected adjacent properties is made to Mitigation Measure M-LU-1a: Notice of Construction Activities, on page 5.2-11.

Mitigation Measure M-LU-1a: Notice of Construction Activities, the first bullet under item 1, on page 1-6, and in Section 5.2.3.4, Land Use and Land Use Planning, Construction Impacts and Mitigation Measures, on page 5.2-11, has been revised as follows:

- Colma Site – Kohl's Department Store; Home Sweet Home Assisted Living Facility, if occupied; Creekside Villas, residential units in front of Kohl's Department Store to the East; and Cypress Lawn Memorial Cemetery.

This revision does not change the analysis or conclusions presented in the Draft EIR.

### 3.7 Aesthetics

**Comment AE-1: Residents' view of the beautiful Bay from their homes, the San Bruno Chinese Church, and Courtland Drive will be significantly impacted for the duration of the South Bruno South site construction.**

Section 5.3.3.4 Construction Impacts and Mitigation Measures (page 5.3-27)

The DEIR indicates that because "residents would have obstructed views (rear views, fenced views, and parking lot views)" that impacts to visual character would be less than significant. The City of San Bruno does not agree that impacts to visual character would be less than significant because of the reasons listed. Residents' view of the beautiful Bay from their homes, the San Bruno Chinese Church, and Courtland Drive will be significantly impacted for the duration of the South Bruno South site construction. The visual character impact is compounded with the noise and traffic impacts the residents will have to endure. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

#### Response AE-1

The commenter cites a portion of the reasons given for the impact determination related to visual character at the San Bruno South site. Other reasons include intermittent viewers, views of staging and spoils areas instead of construction, and the temporary nature of the construction.

On page 5.3-27 of the Draft EIR, the conclusion regarding impacts to visual character at the San Bruno South site has been revised to clarify the nature of the views as follows:

Because higher viewer sensitivity would primarily occur at the church and high school, where viewers are intermittent and views are of staging and spoils areas instead of construction; because most residents would primarily have limited views of construction activity ~~obstructed views~~ (rear views, fenced views, and parking lot views); and because views of construction would be temporary (less than 1 year), impacts to visual character would be *less than significant*.

When all factors are considered, the impacts to visual character would be less than significant. This revision does not change the analysis or conclusions presented in the Draft EIR.

Comments regarding noise and traffic are acknowledged. Please see Response GC-9 for a response.

**Comment AE-2: Show a photo of the area behind 1094 Ridgewood Drive and a mock-up of what the area would look like after project construction.**

The DEIR is inadequate and incomplete in that it does not include a single photo of the area where the pipeline turns sharply and makes a substantial drop in elevation. (In a major earthquake this location is most apt to fail.) Although the DEIR does provide a number of photographic views of the project site from various other locations. In addition, the DEIR evades showing a mock-up or artist rendition of what the project might look like afterward. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

**Response AE-2**

The photographic view of the various project sites are provided in Section 5.3, Aesthetics, of the Draft EIR. The analysis in this section includes the visual character of the area, which in CEQA documents often includes depictions of the site and nearby views. Photographs are not required for the Aesthetics or any other section of an EIR under CEQA, and the Draft EIR is neither inadequate nor incomplete because it does not include a photograph of the particular area in Millbrae described by the commenter.

A permanent retaining wall behind 1094 Ridgewood Drive has been determined not to be necessary, as described above in Response PD-13. Post-construction, topsoil would be replaced in disturbed areas, which would be re-vegetated with native plant seed mix. The ROW would generally be returned to pre-construction conditions, except that unpermitted structures would not be replaced (see Section 3.8.1.1, Common Construction Elements for Pipeline Replacement, pages 3-24 and 3-25).

## 3.8 Transportation and Circulation

**Comment TR-1: The CCSF is responsible for all mitigation, including improvements to state highways.**

As the lead agency, the City and County of San Francisco (C/CSF) is responsible for all project mitigation, including any needed improvements to state highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Required roadway improvements should be completed prior to issuance of the Certificate of Occupancy. (*Erik Alm, AICP, District Branch Chief, California Department of Transportation (Caltrans); letter, April 16, 2013*)

**Response TR-1**

No improvements to the state highway system are proposed or required for the PPSU project. Mitigation for traffic control (Mitigation Measure M-TR-1: Maintain Traffic Flow on

San Bruno Avenue West During the A.M. Peak Hour, on page 5.6-23 of the Draft EIR) is identified to maintain traffic flow if the temporary closure of the right-turn lane of the I-280 off-ramp and the eastbound San Bruno Avenue West lane adjacent to the San Bruno North project site occur simultaneously. The simultaneous use of these lanes could occur during a 2-week period. During this time, eastbound traffic flow on San Bruno Avenue West would be maintained by plating over the access pit on San Bruno Avenue West during the a.m. peak period. This mitigation measure requires the SFPUC or its contractor(s) to coordinate with the City of San Bruno and Caltrans, and requires that the plan for maintaining access conform to the California Manual on Uniform Traffic Control Devices (Caltrans, 2012), as revised above in Response ES-6.

**Comment TR-2: CCSF should coordinate with Caltrans prior to submittal of encroachment permit application.**

Since an encroachment permit is required for work in the state right of way (ROW), and Caltrans will not issue a permit until our concerns are adequately addressed, we strongly recommend that the C/CSF work with Caltrans to ensure that our concerns are resolved during the environmental process, and in any case prior to submittal of a permit application. Further comments will be provided during the encroachment permit process; see the end of this letter for more information regarding encroachment permits. (*Erik Alm, AICP, District Branch Chief, California Department of Transportation (Caltrans); letter, April 16, 2013*)

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. (*Erik Alm, AICP, District Branch Chief, California Department of Transportation (Caltrans); letter, April 16, 2013*)

**Response TR-2**

The comment is noted with respect to the recommendation that early consultation with Caltrans occur prior to submittal of an application for an encroachment permit. SFPUC or its contractor(s) will initiate consultation with Caltrans prior to submittal of an encroachment permit application to ensure that Caltrans' concerns are adequately addressed.

**Comment TR-3: Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.**

Since traffic restrictions and detours will be needed on the state highway system, a Traffic Control Plan (TCP) and a construction traffic study discussing impacts to El Camino Real will be required and approved by Caltrans prior to construction. Please prepare the TCP in accordance with the *California Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address: <http://www.dot.ca.gov/hg/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>.



traffic, the access pit shall be steel plated and secured to prevent movement and excess vibration.) (Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013)

**Response TR-4**

This comment regarding lane closure on San Bruno Avenue West is acknowledged. Please see Response ES-3 for a response.

**Comment TR-5: Lane closure at Whitman Way will create significant traffic delays.**

City's comments regarding the one-way control traffic operations on Whitman Way should be included in this section. (The City prefers two-way traffic be maintained throughout construction along Whitman Way. At the end of each construction day, the excavated area should be steel plated and secured.) (Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013)

**Response TR-5**

This comment regarding construction truck trips and lane closure on Whitman Way is acknowledged. Please see Response ES-5 for a response.

**Comment TR-6: The portion of Courtland Drive between north of San Bruno Chinese Church and Madison Avenue is not a City street.**

Section 5.6.1.2 Local and Site Access and Parking, San Bruno South Site

The DEIR should clearly indicate that portion of Courtland Drive between north of San Bruno Chinese Church and Madison Avenue is not a City street. (Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013)

**Response TR-6**

To clarify the description of Courtland Drive, the following text change has been made to page 5.6-3 of the Draft EIR.

In Section 5.6.1.2, Transportation and Circulation, Local and Site Access and Parking, San Bruno South site, on page 5.6-3 of the Draft EIR, a new sentence has been added after the second full sentence:

The portion of Courtland Drive between north of the San Bruno Chinese Church and Madison Avenue is not a City street.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment TR-7: Address intersection LOS discrepancy.**

Section 5.6.3.4 Construction Impacts and Mitigation Measures

The narrative on page 5.6-18 indicates, "all intersections would continue to operate at acceptable level (i.e., at LOS D or better)." However, Table 5.6-9 shows that one intersection within City of San Bruno would degrade from LOS C to LOS E. (Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013)

**Response TR-7**

The summary statement referenced by the commenter has been updated for consistency with the detailed discussion in the text, under San Bruno North, Impacts on Roadways, pages 5.6-22 through 5.6-24.

In Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures, the last two sentences of the first full paragraph on page 5.6-18 of the Draft EIR have been revised as follows:

As shown in Table 5.6-9, the results of the quantitative LOS analysis indicates that the addition of the construction-generated vehicle trips would not substantially affect existing traffic conditions, and all intersections would continue to operate at acceptable levels (i.e., at LOS D or better), except at the San Bruno North site. With the closure of both the right-turn lane of the I-280 off-ramp and the eastbound San Bruno Avenue West lane adjacent to the project site, the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) would operate at LOS E during the a.m. peak hour, which would not be an acceptable LOS. However, impacts related to simultaneous lane closures at this location would be reduced to a less-than-significant level with implementation of Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, which would allow the LOS at the intersection to be maintained at LOS D. Therefore, the impact from short-term increases in traffic volumes during construction at all PPSU project sites would be less than significant with mitigation.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment TR-8: The impact of Walmart employees on the I-280 San Bruno Avenue on/off-ramps intersection level of service should be addressed.**

Walmart.com moved in the office building at 850 Cherry Avenue in June 2012. Most of the employees use the I-280 San Bruno Avenue on/off-ramps to and from the office. Table 5.6-9 is based on data collected in January 2012 and does not include this large employee occupancy, which may affect the listed intersection level of service. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response TR-8**

Table 5.6-9 on page 5.6-19 of the Draft EIR presents intersection LOS for Existing and Existing plus Project conditions. As indicated on page 5.6-5 of the Draft EIR, peak period traffic volume counts were conducted in April and October 2011, not January 2012 as stated by the commenter. Information regarding occupancy of the existing office building at 850 Cherry Avenue, and therefore employee vehicle trips at the study intersections, during the 2011 count periods is not available. However, this office building has been previously occupied by GAP employees, and signal timing at the I-280 ramps at San Bruno Avenue West presumably has been developed for conditions when the building was occupied. Mitigation Measure M-TR-3: Traffic Control Plan on pages 5.6-36 and 5.6-37 of the Draft EIR includes a measure for all project sites that requires the construction contractor, to the maximum extent feasible, to schedule truck trips outside of the a.m. (7 to 9 a.m.) and p.m. (4 to 6 p.m.) peak

periods, which would minimize conflicts between construction vehicles and Walmart employees traveling to and from the 850 Cherry Avenue office building.

**Comment TR-9: Clarify if a staging area would be provided at the San Bruno North site.**

The narrative on page 5.6-22 indicates a staging area would not be provided at the San Bruno North site. This is not consistent with various discussions and figure in Chapter 3. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response TR-9**

In response to the City of San Bruno's comment, the following text clarifications have been made to page 5.6-22 of Section 5.6, Transportation and Circulation, of the Draft EIR.

Section 5.6, third sentence of the first paragraph in San Bruno North Site, Impacts on Roadways, page 5.6-22 of the Draft EIR, has been revised to read:

During the a.m. and p.m. peak hours, there would be a maximum of two construction truck trips accessing the project site, and 20 construction worker vehicle trips (the intersection impact analysis assumed that construction workers would drive to the site, but because a staging area would not be provided on site that would accommodate construction worker vehicle parking, and on-street parking is not permitted on San Bruno Avenue West, it is anticipated that construction workers would park at the common staging area, and carpool to the site in construction vehicles). A limited number of construction workers may park on residential streets south of San Bruno Avenue West.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment TR-10: A parking survey should be prepared for San Bruno North site and on-street parking should be limited.**

City's requirement to prepare a parking survey and limitation of numbers of construction vehicles occupying on-street parking as commented for Impact TR-3 should be included or referenced in this section. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response TR-10**

This comment regarding a parking survey and construction vehicle on-street parking limits is acknowledged. Please see Response ES-7 for a response.

**Comment TR-11: Discuss the non-peak hour impact to the level of service along the haul routes.**

The DEIR should also discuss the non-peak hours impact to the level of service along the haul routes. The estimated daily construction related traffic is very high and the City anticipates level of service will reduce during non-peak hours. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)



### Response TR-11

The 24-hour traffic volume counts were conducted on Courtland Drive and Shelter Creek Lane (the average daily traffic volumes on these roadways are presented on Table 5.6-2 on page 5.6-5 of the Draft EIR). The distribution of traffic volumes by hour for the 24-hour periods on these two streets indicates that traffic volumes are greatest during the peak hour that was analyzed, and lower during the nonpeak hours, and that a similar hourly distribution could be expected on other haul route streets in San Bruno.

Because traffic volumes on the haul routes during the nonpeak hour are typically lower than during the peak hours analyzed, and because the number of project-generated vehicle trips during the nonpeak hours would be generally be lower than during the peak hours analyzed as indicated in Table 5.6-7 on page 5.6-15 of the Draft EIR, the intersection LOS operating conditions at the study intersections during the nonpeak hours would be similar to or better than conditions during the a.m. and p.m. peak hours that were analyzed. Therefore, short-term construction-related traffic impacts, which were determined to be less than significant for the peak hours, would be similar for the nonpeak hours (less-than-significant impacts).

As indicated on page 5.6-23 of the Draft EIR, Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour would be required to mitigate impacts associated with temporary travel lane closures adjacent to the San Bruno North site on San Bruno Avenue West, and the right-turn lane on the I-280 northbound off-ramp at the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3). The significant impact at the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) would only occur for up to 10 days when the I-280 Northbound ramp closure and eastbound San Bruno Avenue West lane closure overlap, and is not related to construction-vehicle traffic.

### **Comment TR-12: Discuss impacts of haul trucks to the left turn pocket on San Bruno Avenue to Shelter Creek Lane and the I-280 Crystal Springs Road on/off-ramp.**

Assuming truck traffic will enter City limits via I-280 San Bruno Avenue off-ramp, trucks will head west on San Bruno Avenue to Shelter Creek Lane. The left turn pocket on San Bruno Avenue to Shelter Creek Lane is relatively short. The Draft EIR should discuss the potential impact and mitigation measures for this intersection. The City has similar concerns for trucks entering/exiting I-280 Crystal Springs Road on/off-ramp. The critical two intersections for this route are the signalized and the non-signalized Cunningham Way and Crystal Spring Road. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

### Response TR-12

As indicated in Table 5.6-9 on page 5.6-19 of the Draft EIR, the addition of project-generated construction vehicles during the a.m. and p.m. peak hours (primarily construction worker vehicle-trips) at the signalized intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4) would not substantially affect intersection operating conditions, and the intersection would continue to operate at LOSs D and C (a.m. and p.m., respectively), which would be considered an acceptable LOS and would not result in a significant impact under the traffic policies of either the San Francisco Planning Department or the City of San Bruno. Therefore, traffic impacts at the intersection of Crestmoor Drive/San Bruno Avenue

West/Shelter Creek Lane were determined to be less than significant during the peak hours. During the nonpeak hours, there would be fewer project-generated vehicles passing through the intersection, with up to 15 inbound and 15 outbound construction truck trips traveling through the intersection during an hour. Because both overall intersection volumes and construction-related traffic volumes would be lower during the nonpeak hours (i.e., fewer impacts than during the peak hours), it is anticipated that traffic impacts at the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane would be less than significant.

However, in response to the City of San Bruno's comment, the following improvement measure has been added after the last paragraph under San Bruno South site, Impacts on Roadways from Construction Traffic, on page 5.6-26 of the Draft EIR:

Although the PPSU project would not have significant traffic impacts at the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), the following improvement measure has been included to address concerns related to the left turn pocket from San Bruno Avenue to Shelter Creek Lane raised during the Draft EIR public review period.

**Improvement Measure I-TR-B: Monitoring of Westbound Left-Turn Lane from San Bruno Avenue West onto Shelter Creek Lane**

At the San Bruno South site, SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), to determine whether construction vehicles traveling to the site spill back from the westbound left-turn lane onto San Bruno Avenue West, and develop strategies to reduce the potential for spillback. These strategies could include scheduling of construction vehicles to ensure arrival throughout the hour (rather than multiple trucks following each other); changes in signal timing during the nonpeak hours to provide additional green time for westbound traffic flow; requiring construction vehicles arriving via I-280 southbound to use the I-280 off-ramp at Cunningham Way; and other strategies developed with the City of San Bruno.

Proposed haul routes for the San Bruno South site do not include Crystal Springs Road; therefore, construction vehicles would not affect conditions at the signalized intersection of Crystal Springs Road/Cunningham Way.

As described on page 5.6-40 of the Draft EIR, construction activities at the San Bruno South site would use the I-280 ramps (southbound off-ramp and northbound on-ramp) at Cunningham Way, and would add four truck trips (two inbound and two outbound) and up to 10 construction worker vehicle trips to this intersection during the a.m. and p.m. peak hours. During nonpeak hours, construction activities would add an average of four truck trips (two inbound and two outbound). These volumes would not contribute considerably to intersection operations. As indicated on page 5.6-40 of the Draft EIR, construction at San Bruno South site would overlap with the HTWTP project. The HTWTP Long-Term Improvements Project Draft EIR includes a mitigation measure at the intersection of the I-280 on-ramp and Cunningham Way, which entails installing and operating a temporary traffic signal or use of flaggers at the intersection (SF Planning, 2010).

In response to the City of San Bruno's comment, the following improvement measure has been added after Mitigation Measure C-TR: Assign SFPUC Water System Improvement Program Projects Construction Coordinator, on page 5.6-41 of the Draft EIR:

Although the PPSU project would not contribute considerably to the movements at the unsignalized intersection of the I-280 ramps/Cunningham Way, the following improvement measure has been included to address concerns raised during the Draft EIR public review period.

**Improvement Measure I-TR-D: Monitoring Plan for the Unsignalized Intersection of the I-280 Ramps/Cunningham Way**

At the San Bruno South site, the SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the unsignalized intersection of the I-280 ramps/Cunningham Way to determine whether traffic controls such as using a flagger or installing and operating a temporary traffic signal are warranted during PPSU San Bruno South construction activities.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment TR-13: Describe cumulative impacts related to the Crystal Springs Terrace's New Recreation Building project.**

Section 5.6.3.6 Cumulative Impacts and Mitigation Measures

As commented under Section 5.1.3 List of Relevant Projects, discuss how may the Crystal Springs Terrace's New Recreation Building project may further complicate or increase traffic impact on Crystal Springs Road and the haul route. (*Klara A. Fabry, Public Services Director, City of San Bruno; letter, April 29, 2013*)

**Response TR-13**

Because construction of the Crystal Springs Terrace Apartments Recreation Building and Residential Units project is planned to be completed by January 2014 (Gauss, 2013), there would be no overlap between the construction of this project and the PPSU project construction, and thus no cumulative impact (see Response CU-1). Changes in operations-related traffic conditions from the Crystal Springs Terrace Apartments Recreation Building and Residential Units project compared to existing conditions at the apartments are anticipated to be primarily associated with the four new residential units (the 11 new parking spaces would accommodate the parking demand associated with the residential units); the planned recreation component of the project would be the relocation of existing recreation uses that serve the apartments and would not increase traffic. The increase in peak hour traffic volumes associated with the four additional units during the apartment project operations would be very minor; similarly, operation and maintenance of the proposed project would result in a negligible increase in traffic volumes. Therefore, the proposed PPSU project construction traffic combined with the operations of the Crystal Springs Terrace Apartments Recreation Building and Residential Units project would not result in a cumulative impact.

**Comment TR-14: Project construction may affect holiday traffic along Serramonte Boulevard in Colma.**

As was mentioned in our scoping letter, Colma is a regional shopping destination for automobiles (along Serramonte Boulevard) and other retail establishments. From Thanksgiving weekend through New Year's, traffic increases for holiday shopping – especially on weekends. While construction of the project could take place during this timeframe, additional provisions would need to be made to manage the project so as not to impact businesses during this time. (Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013)

**Response TR-14**

Impact TR-3: Project construction activities could decrease the safety of public roadways for vehicles, bicyclists, and pedestrians, on page 5.6-35, acknowledges that if construction activities overlap with the December holiday shopping season, traffic volumes at the Kohl's parking lot would increase, thereby increasing the potential for conflicts between construction vehicles and pedestrians and motorists. This impact would be reduced through implementation of Mitigation Measure M-TR-3: Traffic Control Plan, which is described in detail on pages 5.6-36 through 5.6-38.

The staging area would be designed so as to not impede access to and circulation along the rear of the store, and none of the customer parking in front of the store would be displaced. Because the area designated for construction staging is not used for customer parking, even during the holiday shopping period, the temporary removal of the 40 parking spaces would not substantially affect the overall use of the Kohl's department store. However, in response to the Town of Colma comment, the following measure has been added to the first bullet related to the Colma site in Mitigation Measure M-TR-3: Traffic Control Plan, under Specific Measures for Project Sites, on pages 1-26 and 5.6-37 of the Draft EIR:

At the Colma Site, flaggers shall be provided at the Serramonte Boulevard driveway to the staging area and Kohl's department store site, to reduce the potential for conflicts between construction vehicles and customers accessing the Kohl's parking lot via Serramonte Boulevard. If construction activities occur on weekends, flaggers shall also be provided.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment TR-15: Traffic flow into/out of garages at Shelter Creek Condominiums and construction vehicle and resident parking access.**

It is mentioned that between the working hours of 7 am to 5 pm, there will be traffic control personnel on site to help to help with the flow of traffic on the Whitman Way driveway/Fire Lane to facilitate access to the lower level of G4, and Lots C & B. Is any of the road area going to be used to bring in any of the construction equipment? We were planning to resurface these areas this year. What will the effect be if we do so? (Shelter Creek Condominiums Board of Directors; letter, April 26, 2013)

We've had several meetings at the site with the project manager and project engineer and they've been extremely helpful and very cooperative in looking at the project site and establishing proper methods of construction. I know it is part of the EIR process to also deal with traffic issues. I think from what I've read that those issues have been appropriately addressed. What Shelter Creek wants to make sure is that the people who live there -- it's 1,296 units. It's like a small town. I think there are about 3,000 residents living within Shelter Creek. They've got parking lots scattered all over the place and some of them by virtue of the planned construction activities aren't going to do -- they're going to be somewhat landlocked. So either make absolutely certain that all necessary considerations are taken so nobody gets locked in, nobody gets locked out; free flow of traffic in and out, especially during work hours coming and going. I believe that those things have been taken care of. I want to make sure that all those issues are properly taken care of. (*Michael Allen, General Counsel, Shelter Creek Condominiums; public hearing transcript, April 16, 2013*)

### **Response TR-15**

Construction routes are shown on Figures 3-2 through 3-6 in Chapter 3 of the Draft EIR. Construction equipment access to Shelter Creek Condominiums would be via a driveway off of Shelter Creek Lane, as shown in Figure 3-5.

A new sentence has been added after the second sentence at the top of page 3-33 of the Draft EIR (Section 3.8.7, Site Access and Construction Vehicle Routes, San Bruno South) to clarify the potential use of the Shelter Creek Condominiums Driveway/Whitman Way/Eastburn Court (intersection #8) for construction, as follows:

This alternative access would also be used for construction access by vehicles, but would not be used by heavy equipment such as haul trucks.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Resident access and parking at Shelter Creek Condominiums is described on page 5.6-29 of the Draft EIR: "During construction hours, access into and out of the lower level of Garage 4, Lot B, and Lot C could be maintained via a 12-foot-wide fire lane that connects Lot C with the Shelter Creek Condominiums driveway at Whitman Way (Intersection #8). Because the fire lane does not allow for two-way travel, alternate one-way traffic operations would be required, and flaggers with radio communication would control alternating outbound and inbound vehicles. Traffic volumes conducted in September 2012 indicate that between 7 a.m. and 7 p.m., there are about 145 inbound and 177 outbound vehicle trips associated with Garage 4 and Lot C, with roughly 200 vehicles trips (inbound/outbound) between 8 a.m. and 5 p.m. See discussion in Impact TR-2 regarding maintaining emergency vehicle access within the Shelter Creek Condominiums site during project construction." Construction ingress/egress via Intersection #8 is not proposed.

Mitigation Measure M-TR-3: Traffic Control Plan on pages 5.6-36 through 5.6-38 of the Draft EIR includes measures that would require that access to lower Garage 4, Lot B, and Lot C be maintained to the maximum extent feasible, and that alternative fire access to building #3B also be maintained. The construction contractor shall be required to have ready at all times the means necessary to accommodate emergency vehicles, such as plating over excavations

through the use of steel plate to provide for a fire lane with a minimum width of 12 feet. The traffic control plan shall include flaggers with radio communication to allow ingress/egress to the parking areas.

Plans to resurface the roadway are noted. If the pavement is damaged during construction, SFPUC will repair it, as described in Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures, Mitigation Measure M-TR-3: Traffic Control Plan, the fourth bullet on page 5.6-37:

- Roadway rights-of-way shall be repaired or restored to their original conditions or better upon completion of construction.

**Comment TR-16: Alternate locations for trash bins at Shelter Creek Condominiums.**

Trash staging area for pick up by San Bruno Recology (three times a week) runs along the construction zone, and is the pick-up area for 10, half yard trash bins. Where can this staging area be relocated for pick up? This includes the trash room access area of the south end of building 4 in the construction zone. The access to this room will be severely restricted. The construction area on Driveway 3 is also a main collection point for the bins for Buildings 3, 4 and 5. We will need to come up with an alternate route and site. There is no alternative, though, for this one garbage room at building 4. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

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And I think that the last point I've raised has to do with certain structures. It may not be necessarily controlled by the EIR. There are some structures that are built in Shelter Creek and they are going to be impacted by the construction activities, specifically since some areas, garbage enclosures and things of that nature, they're going to be either eliminated for a time or they'll have to be relocated and we want to make sure that proper accountability exists for relocating those and repositioning them so that that doesn't become a problem during the construction period. (*Michael Allen, General Counsel, Shelter Creek Condominiums; public hearing transcript, April 16, 2013*)

**Response TR-16**

The construction contractor will be required to relocate garbage enclosures and similar structures during construction, in such a way that they will be available for their intended use, although the temporary location may be further for residents to access. For example, Lot C, which includes parking and maintenance facilities, may serve as an alternative location for the garbage enclosure. See Response GE-3 for more detail pertaining to the garbage enclosures.

**Comment TR-17: Revenue loss from loss of parking spaces during construction.**

The Association rents parking spaces to residents in lot B adjacent to either side of the recycling enclosure. The revenue loss is \$7,200 per year and those renters will be displaced for the duration of the project. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

### Response TR-17

Fiscal issues are not, in and of themselves, physical environmental impacts requiring analysis in an EIR. To the extent that the loss of parking has potential physical environmental impacts, those issues are addressed in the Draft EIR beginning on page 5.6-16, under Impact TR-1.

The SFPUC ROW Division will meet with individual property owners the Shelter Creek Condominiums to discuss each party's real estate rights and expected impacts from this project. The SFPUC intends to outline and reach written agreement with property owners the Shelter Creek Condominiums on these issues before the construction contract is opened for bid.

### Comment TR-18: Construction traffic safety concerns to nearby schools and churches.

I live on Ridgewood Drive and this is a quiet residential area with families with young children. The Meadow School is just a few blocks from Ridgewood Drive and this would be very dangerous for children going to and from school. (*Clara R. Taylor; letter, April 16, 2013*)

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We are also concerned about the traffic routing on Sundays. I realize you're not doing work on Sundays, but whatever the condition is, we're concerned about that (inaudible) for us to access the space, because we did have a EIR done, a traffic survey for our use up here for our ministries permit, and we want to make sure that the impact of the community, with us coming on Sunday, isn't greater than what we had along that EIR because then the complaints will be to us as we come to church -- probably to you guys as well, but we want to be good neighbors and we don't want to impact the neighborhood any more than we said we would and -- than have approval in the city. Those are my comments. (*Charlie Royce, Director of Administration for Central Peninsula Church; public hearing transcript, April 16, 2013*)

### Response TR-18

Potential traffic conflicts associated with Meadows Elementary School were analyzed in Section 5.6.3.4, Construction Impacts and Mitigation Measures, Impact TR-3: Project construction activities could decrease the safety of public roadways for vehicles, bicyclists, and pedestrians. On page 5.6-36 of the Draft EIR, the analysis has determined that, "PPSU construction traffic would not conflict with a.m. peak period drop-off or p.m. peak period pick-up activities at the Meadows Elementary School, which occur on Helen Drive about 700 feet north of Larkspur Drive."

The Draft EIR describes the parking conditions at Peninsula High School that are referred to by the commenter. On pages 5.6-30 and 5.6-31, the Draft EIR states, "On Sundays, when soccer games and other sports activities at the athletic fields overlap with church services at the San Bruno Chinese Church and the Central Peninsula Church, parking spaces in the north high school parking lot are fully used. To manage the parking conditions during these overlapping periods, the Conditional Use Permit for the Central Peninsula Church issued by the City of San Bruno (City of San Bruno, 2011) requires a parking management strategy that restricts parking for church-related activities to the basketball courts; it also prohibits church parking in areas adjacent to the athletic fields, as well as on-street parking on Courtland Drive. In addition, the Conditional Use Permit identifies overflow parking for the church and

sports activities at the southern parking lots in front of the school (approximately 60 spaces) and behind the school (approximately 50 parking spaces). Because the proposed staging area would not affect the on-street parking supply on Courtland Drive or the off-street parking supply within the Peninsula High School, it would not affect parking use.”

There would be limited, if any, construction work occurring on Sundays in the vicinity of the Central Peninsula Church. If such construction were to occur, flaggers would be provided in accordance with Mitigation Measure M-TR-3: Traffic Control Plan, the first full paragraph on page 5.6-38, which states: “Flaggers shall be provided on Courtland Drive at the construction vehicle access to the staging area within the Peninsula High School site, to reduce the potential for conflicts between construction vehicles and vehicles destined to other parking or passenger loading/unloading areas within the site. If construction activities occur on weekends, flaggers shall be provided.”

**Comment TR-19: Construction and church traffic concerns at San Bruno Chinese Church and construction hours.**

Hi, I'm Alan Wong. I'm a church deacon. I have a comment concerning just a couple of the areas. I think some previous speaker, I mean Anthony has already mentioned about the traffic condition they're talking about. The main thing is that we have a number of people who join our club on Mondays and Friday only to use (inaudible), but you're working seven days a week, I'm sure, to do anything; is it correct? *(Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013)*

Oh okay, good enough. One of my concerns is our space in the area, because one of the parking lots in south, the south side (inaudible) and which is that we (inaudible) use all the parking space, especially on Saturday and Sunday. Monday and Friday it wasn't that much, but we do have some visitors. We do have some literary and some reading taking place on Monday and Friday. It's not every day, but we do need that space. *(Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013)*

However, if the traffic concerns, if you have a lot of trucks getting out of the space and some of our congregation will have limited space of getting in and out, but I'm not worried about all that. We also have a (inaudible) on the side we have two gates. One on the front and one on the back and we can use that as a drop-off point for our meeting. *(Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013)*

We would like that if you do that, we would like to clear the parking lot using its stage from Saturday to Sunday; clearing out all of this because we need all the parking. So our congregation -- as far as you know, we have 80 parking spaces. But if you take that, you're taking a whole side; one-third of the parking space away. And we do need that back. So we need that to clear that area from Saturday to Sunday. Saturday, so for someone who's making just another holiday, but for us it's very aggravating. We have school, we have meetings and we have some athletic activity going on there. So Sunday and Saturday -- Sunday, it's often all day, so that's our concern. We need that area to clear for us to use it as well, okay? *(Alan Wong, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013)*



My name is Anthony Cheung with the San Bruno Chinese Church here. I'm one of the deacons. I was just waiting to see what I need to add to his comments. The site that's been (inaudible) I see (inaudible) the two routing for the trucks. One of them is on the road which is fine with me and the second one is actually going through our parking lot. On the (inaudible) parking lot, but that is the largest parking lot we have in our centers. So on Saturdays we have Chinese school, so there are little children running around many times here on the lawn, but there's a group of students, they play basketball on the parking lot. We use that parking lot as a basketball court. So Saturdays and Sundays, I would appreciate if you don't have overtime work, because maybe we'll have children running around on Sundays and Saturdays. Thank you. *(Anthony Cheung, Deacon, San Bruno Chinese Church; public hearing transcript, April 16, 2013)*

### **Response TR-19**

Construction will primarily occur Monday through Friday, although some weekend work would occur, as described on page 3-36 of the Draft EIR under Section 3.8.9, Construction Schedule and Equipment:

“Construction activities would occur primarily during weekdays, from 7 a.m. to 5 p.m. Weekend work may be required on a limited basis, although the nature of such work is not currently known. Weekend construction hours would be the same as those described for weekdays.” However, weekend hours at the Colma and Millbrae sites would differ from weekday hours, as required in Mitigation Measures M-NO-3a: Limit Hours of Construction at Colma Site (page 5.7-42 of the Draft EIR) and M-NO-3b: Limit Hours of Construction at Millbrae Site (page 5.7-43 of the Draft EIR), which have been revised in Response PD-2, above.

If weekend work is necessary, prior notice will be given to the San Bruno Chinese Church, as described in Mitigation Measure M-LU-1a: Notice of Construction Activities, on page 5.2-10 of the Draft EIR, which states, “Should weekend work be necessary, the SFPUC shall notify adjacent properties, including reasonable advance notification to the businesses, owners, and residents of adjacent areas potentially affected by the proposed project, and interim updates shall be provided.” If parking is required for weekend construction activities in the vicinity of the San Bruno South site, the staging area on the Peninsula High School parking lot may be used. However, the church parking lot would not be used during the weekend by the SFPUC or its contractors, as described in Section 3.1.4 of Chapter 3, Project Description, which states, “The proposed staging area for the San Bruno South site at the northern parking lot of the San Bruno Chinese Church would be used during the week for project staging, but would be available for church parking during the weekend so that adequate parking would be maintained during the most attended church activities” (page 3-7). There are two driveways that allow access to the San Bruno Chinese Church (a north and south driveway).

Also, on page 5.6-30 of the Draft EIR, the parking situation at the San Bruno Chinese Church is specifically discussed: “The San Bruno Chinese Church has a total of about 80 parking spaces on site (including the 15 spaces in the proposed staging area). On weekends, all parking spaces are occupied; however, no spillover onto adjacent streets is required to accommodate the church’s parking demand (Wu, 2012). Construction staging at the San Bruno South site includes the north parking lot on the San Bruno Chinese Church property. The project construction activities would occupy the parking area during the week, and

would return the area during the weekend for church parking, as described in Chapter 3, Project Description. Therefore, the project would not change the available parking supply at the San Bruno Chinese Church during peak demand periods, and the parking demand associated with church services would continue to be accommodated on site.”

General Measures for All Project Sites are provided to reduce localized circulation impacts, as described in Mitigation Measure M-TR-3: Traffic Control Plan, pages 5.6-36 and 5.6-37. Such measures include advance warning signs placed upstream of work areas advising motorists, bicyclists, and pedestrians of the construction zone ahead in order to minimize hazards associated with construction activities, including the vehicular entry and egress of project-related construction activities; a public information system to advise motorists, bicyclists, and nearby property owners of the impending construction activities (e.g., direct distribution of flyers to affected properties, email notices, portable message signs, and informational signs); storage of all equipment and materials within the designated work areas to avoid obstructing traffic; implementation of roadside safety protocols such as advance “Road Work Ahead,” “One Lane Road Ahead,” “Flagger Ahead,” “Prepare to Stop,” and “Trucks Entering Road” signs; warning signs and speed control to achieve speed reductions for safe traffic flow through the work zone; maintenance of pedestrian and bicycle access and circulation during project construction where it is safe to do so, or, where appropriate, including detours for bicycles and pedestrians in areas affected by project construction; scheduling of truck trips (i.e., haul trucks and heavy construction equipment) outside of the a.m. (7 to 9 a.m.) and p.m. (4 to 6 p.m.) peak commute periods to the maximum extent feasible; and coordination of construction with facility owners or administrators of sensitive land uses such as schools, police and fire stations, churches, hospitals, and residences.

The SFPUC’s intent is to outline and reach written agreement with property owners on these issues before the construction contract is opened for bid.

## 3.9 Noise

### **Comment NO-1: Vibration levels from heavy equipment near buildings.**

The noise issue is addressed in the DEIR with the threshold to be at 70 decibels, are the vibration levels from the use of the heavy equipment discussed? That is one of the most critical issues since the trenching will be down to 30 feet in depth. Since there will be two separate trenches, dug at two different times and coming as close as 15 feet to building 4 at one point. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

### **Response NO-1**

The daytime construction noise threshold is 70 decibels, as described in Section 5.7.3.2, Approach to Analysis, on page 5.7-22 of the Draft EIR. The vibration levels resulting from construction, including the use of heavy equipment, are described in Impact NO-4: Construction activities could result in exposure of persons or structures to generation of excessive groundborne vibration, beginning on page 5.7-44 of the Draft EIR. For the San Bruno South site, which includes the Shelter Creek Condominiums, the following information is provided on page 5.7-48: “There are 11 single-family homes along Courtland

Drive; several units at the Park Plaza Apartments; and the Shelter Creek Condominium Buildings 4A, 4B, and 4D potentially located within 50 feet of vibratory roller activities and within 60 feet of pile driving activities. At these receptors, vibratory roller activities could generate vibration levels up to 0.58 in/sec PPV and pile driving activities could generate vibration levels of 0.47 to 2.0 in/sec PPV; these levels exceed the damage potential threshold, a potentially significant impact. Implementation of Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, which requires vibration control measures and monitoring as part of a Vibration Control Plan, would reduce vibration impacts to *less than significant with mitigation.*" The complete text of Mitigation Measure M-NO-4 is provided on pages 5.7-46 and 5.7-47 of the Draft EIR.

In addition, vibration related to nighttime construction activities at the San Bruno South site is described on page 5.7-48 of the Draft EIR as: "Nighttime activities would be limited to pipeline dewatering. Because the pump for the dewatering would be mounted to a trailer supported on rubber tires, it would not generate substantial vibration levels. Therefore, pipeline dewatering-related vibration levels would be *less than significant.*"

**Comment NO-2: A contingency for relocation of residents should be provided due to noise levels.**

Screens may not help. They are good for the dust but uncertain that they will be that effective for the noise for the sustained time of the digging these large trenches. Some contingency needs to be made in case relocation of the residents becomes necessary. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

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The fact that the proposed project comes with unavoidable impacts on the adjacent property owners is one issue. The residents at 1094 and 1100 Ridgewood are all retired individuals and we spend a great deal of our time at home, to suggest that we should close our windows and or change our schedules is not applicable. The second issue is how the SFPUC is going to mitigate the unavoidable impacts. We suggest that SFPUC mitigate this abysmal situation by providing us with temporary housing within the city of Millbrae. So that we are not listening to deafening construction noises for 8 to 12 hours per day and up to 7 days per week for up to 4-5 months. This solution would also reduce/eliminate the exacerbation of the resident's medical conditions. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

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First of all, the project site for San Bruno South comes very, very, very close to what's called Building 4 in Shelter Creek. I believe it's within 40 feet of occupying residents. It may be 50 feet. And a lot of those folks are home all day, they don't work. And so we have serious concerns about sound mitigation issues that may arise relative to the proximity of those units to the construction site. And I did read the EIR and I believe it does indicate that there are significant impacts for noise in that area and I didn't see anything in there that suggested that there were going to be some extraordinary measures taken for sound attenuation or mitigation in that area. So that would be my questions. Is there any action being taken to establish sound mitigation in that area, specifically. I know that there's a lot of houses along that route, coming down Laurence (phonetic) and Shelter Creek and I don't know if you've got sound mitigation planned in those areas. Nine months of having heavy equipment right outside of the windows of those particular

units is going to be a problem. That's number one. (*Michael Allen, General Counsel, Shelter Creek Condominiums; public hearing transcript, April 16, 2013*)

## Response NO-2

Screens or noise barriers are effective for reducing noise impacts, and they are included in Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, described on pages 5.7-31 through 5.7-33 of the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on pages 1-32 through 1-37 and pages 5.7-31 through 5.7-33 of the Draft EIR, has been revised to clarify that the noise control plan should evaluate the appropriate height of noise barrier walls, given the multi-story buildings adjacent to the construction zone, as follows:

- f) Erect temporary noise barriers to maintain construction noise levels at or below the performance standards. Barriers shall be constructed with a solid material, with a density of at least 2 pounds per square foot and no gaps. The location, height, and specification of the barriers shall be determined by the approved noise consultant as part of the noise control plan.

Additionally, the analysis on page 5.7-34 of the Draft EIR pertaining to the Shelter Creek Condominiums has been revised to clarify the potential use of noise barriers to reduce impacts at upper floor receptors, as follows:

Even with implementation of Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls...which requires noise control measures and noise barrier walls as part of a Noise Control Plan, construction-related noise levels could still exceed the 70-dBA  $L_{eq}$  speech interference threshold by up to 22 dBA. When compared to the average daytime ambient noise levels, the mitigated noise levels would exceed the average ambient levels by up to 30 dB. With such an exceedance, the mitigated construction noise levels would be clearly audible during daytime hours. The appropriate height of noise barrier walls would be evaluated during preparation of the noise control plan. ~~Although noise barrier walls can be employed to mitigate noise at ground floor receptors, However, due to structural, wind, and seismic constraints, it may~~ not be feasible to construct noise barrier walls tall enough to mitigate construction-related noise levels at upper floor receptors. Therefore, the mitigated noise levels would be significant and unavoidable with mitigation.

Additionally, the analysis on pages 5.7-34 and 5.7-35 of the Draft EIR pertaining to the Park Plaza Apartments has been revised to clarify the potential use of noise barriers to reduce impacts at upper floor receptors as follows:

Even with implementation of Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls... which requires noise control measures and noise barrier walls as part of a Noise Control Plan, construction-related noise levels could still exceed the 70-dBA  $L_{eq}$  speech interference threshold by up to 22 dBA. When compared to the average daytime ambient noise levels, the mitigated noise levels would exceed the average ambient levels by up to 33 dB. With such an exceedance, the mitigated construction noise levels would be clearly audible during daytime hours. The

appropriate height of noise barrier walls would be evaluated during preparation of the noise control plan. Although noise barrier walls can be employed to mitigate noise at ground floor receptors, However, due to structural, wind, and seismic constraints, it may not be feasible to construct noise barrier walls tall enough to mitigate construction-related noise levels at upper floor receptors. Therefore, the mitigated noise levels would be significant and unavoidable with mitigation.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on pages 1-32 through 1-37 and pages 5.7-31 through 5.7-33 of the Draft EIR, has also been revised to clarify the process through which noise complaints will be addressed during construction, as t(o)- nel9(a@91c12)-26(n)-14v)9(e)-5rgated

Figures 3-2 through 3-6 in Chapter 3 of the Draft EIR. Access to Shelter Creek Condominiums would be via a driveway off of Shelter Creek Lane, as shown on Figure 3-5.

Vibration monitoring would be completed as outlined in Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on pages 5.7-46 and 5.7-47 of the Draft EIR. A vibration control plan will be prepared, and specific vibration control measures, including monitoring, will be included in the plan. Copies of reports may be obtained by contacting the SFPUC's designated communications liaison. For general inquiries, call (415) 554-3289.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 1-40 and page 5.7-46 of the Draft EIR, has been revised as follows:

- f) Weekly reporting of the vibration monitoring results, including distribution of reports to interested parties that have requested them.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment NO-4: Update distance between 1094 Ridgewood Drive and the proposed construction zone.**

The Draft EIR incorrectly states that 1094 Ridgewood is 10' from the proposed construction zone. Please note that the pipeline replacement project will occur within 13' of our home at 1094 Ridgewood in Millbrae, CA. The front property width is 80'; and on the southern boundary there is a 7' public service easement, our house covers an additional 40' and on the northern boundary there is the 20' San Francisco Public Utilities Commission easement for a sum total of 67'. See The Exchange Deed dated November 4, 1955, and recorded December 6, 1955, in Book 2929 of the official records of San Mateo County at page 244 (10198-N). (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

**Response NO-4**

The EIR will be revised to reflect that 1094 Ridgewood Drive is 13 feet from the pipeline replacement, rather than 10 feet as described in Section 5.7.1.4, Sensitive Receptors, on page 5.7-14 of the Draft EIR. The following text change has been made, as follows.

Section 5.7.1.4, Noise and Vibration, Sensitive Receptors, the last full sentence under Millbrae Site on page 5.7-14:

The nearest sensitive receptors are the single-family residences at 1094 and 1100 Ridgewood Drive, ~~both of which are~~ located 13 and 10 feet from the project site, respectively.

Please note that an additional 3 feet of separation from the proposed project in this location provides some reduction in the projected noise level (approximately 1 to 2 dBA) that would be experienced at 1094 Ridgewood Drive. This slight potential reduction in projected construction noise levels at this one residence does not change the analysis or conclusions presented in the Draft EIR.

The Exchange Deed for 1094 Ridgewood Drive is noted. See Attachment A, Letter C-2, comment NO-4 for deed provided by commenter.

**Comment NO-5: Sound of water rushing through pipeline can be heard at night. Adverse effects of this noise should be addressed and insulation should be installed on pipe as part of proposed project.**

The SSBPL pipeline located in our north yard is directly adjacent to two of our bedrooms, and at night, one can hear the massive amounts of water rushing through the pipe and the changes in intensity when opening valves at different times throughout the night/week; and to our knowledge, the SFPUC has not monitored the noise levels from the water main nor include insulating this pipeline in its up-graded seismic project plans. Even though there is sufficient evidence from large-scale epidemiological studies linking the population's exposure to environmental noise with adverse health effects. The World Health Organization's guidelines recommend that a nighttime average level of noise suitable for undisturbed sleep of from 35 to 30 dB. Therefore, this environmental noise should be considered as a concern for public health and environmental health. (*Henry L. Cash and Lais Henderson-Cash; letter, April 26, 2013*)

**Response NO-5**

The purpose of the proposed seismic upgrade does not include pipeline insulation of the underground SSBPL, and the comment regarding the existing nighttime noise levels as experienced inside the residence at 1094 Ridgewood Drive and the attached article, Effects of environmental noise on sleep (Noise & Health, 2012, Volume 14, Issue 61, pages 297-302, by Kenneth I. Hume, Mark Brink, and Mathias Basner) are not pertinent to the Draft EIR, because no nighttime construction is proposed at or near 1094 Ridgewood Drive, and the proposed project operations would not be modified; no effect on existing nighttime noise would result at that location.

The article in the journal Noise & Health, called Effects of Environmental Noise on Sleep (Noise & Health, 2012) is noted. See Attachment A, Letter C-2, comment NO-5 for article provided by commenter.

### 3.10 Utilities and Service Systems

**Comment UT-1: Provide greater clarity regarding wholesale customer services.**

4. Section 5.12.1.1 – Utilities/Water Supply (page 5.12-3)

The first sentence in the “Water Supply” section should be modified to provide greater clarity. By contractual agreement, the SFPUC provides water supply to 26 wholesale customers via the San Francisco Regional Water System. Several Wholesale Customers receive their water through turnouts located within the project area off SAPL2, SAPL3, and SSBPL. The Wholesale Customers, which includes 24 cities and water districts, plus two private utilities in San Mateo, Santa Clara, and Alameda counties, are represented by the Bay Area Water Supply and Conservation Agency (BAWSCA). (*Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013.*)

5. Section 5.12.3.4 – Construction Impacts and Mitigation Measures (page 5.12-14)

Impact UT-2 notes “the PPSU project does not propose to relocate such utilities owned and operated by other utility companies...” while acknowledging relocation may become necessary. Earlier in Section 3.1 the text identified pipe and valves connecting two customer services (one at the Colma site and one at the South San Francisco site) that would be replaced as part of the construction activities. While replacement is not relocation, it would be consistent with the earlier description to acknowledge in this narrative the two instances where water utility customer impacts have been identified. (*Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency; letter, April 29, 2013.*)

**Response UT-1**

To clarify the description of water delivery to wholesale customers, the following text changes have been made to page 5.12-3 of the Draft EIR.

Section 5.12, first sentence of the first paragraph in Section 5.12.1.1, Utilities, Water Supply, page 5.12-3:

By contractual agreement, the SFPUC provides water delivery services via the San Francisco Regional Water System existing Crystal Springs/San Andreas Transmission System to 26 wholesale customers. via in San Mateo County and the San Francisco Peninsula region. Several wholesale customers receive their water through turnouts in the project area off SAPL2, SAPL3, and SSBPL.

Impact UT-2 refers specifically to the relocation of regional or local utilities, and the impact statement identifies potential health effects or disruptions to the service area during relocation. For replacement of service connections at Colma and South San Francisco, because replacements are in the same locations as the existing service connections, risks associated with encountering other utilities would not occur, and the mitigation measures identified for Impact UT-2 would not apply.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment UT-2: Any damaged utilities owned by the city should be repaired.**

5. Any utilities owned by the City damaged during construction shall be repaired as directed by the City in accordance to City standards. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)

**Response UT-2**

The SFPUC agrees that any City of Millbrae-owned utilities damaged during construction shall be repaired as directed by the City in accordance with City standards. The following text change has been made to Mitigation Measure M-UT-1e: Ensure Prompt Reconnection of Utilities, on page 5.12.13 of the Draft EIR.

Mitigation Measure M-UT-1e: Ensure Prompt Reconnection of Utilities, on page 1-49 and in Section 5.12.3.5, on page 5.12-13, has been revised to include a new second sentence as follows:



Any utilities inadvertently damaged during construction shall be repaired to pre-project conditions.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Comment UT-3: Responsibility for replacing landscaping and irrigation lines after project construction.**

Landscaping and irrigation lines will be removed by SF PUC during the project. Who will be responsible for safely removing and re-establishing irrigation and electrical lines during and after the project completion? If the irrigation lines are capped off, who will be responsible for providing water to the interrupted outlying landscaping areas not directly in the project area. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

**Response UT-3**

Section 3.8.1, Pipeline Replacement and Stabilization, Site Mobilization and Preparation, on page 3-23 of the Draft EIR, describes the process for removing landscaping and encroachments in the SFPUC ROW prior to construction, as follows: "Site mobilization and preparation would include the preparation of the site for excavation and, depending on the site, would require the removal of existing structures, pavement, and vegetation consistent with the SFPUC's Right-of-Way Encroachment Policy (SFPUC, 2007b), the SFPUC's Right-of-Way Integrated Vegetation Management Policy (SFPUC, 2007a), and with the terms of existing easements, as applicable. Existing encroachments on SFPUC property would be removed prior to construction. Such encroachments include small structures, fences, and landscaping belonging to the properties through which the SFPUC ROW extends." This may include irrigation lines.

Site Mobilization and Preparation, on page 3-23 of the Draft EIR, has been revised to include the following text after the third sentence within the first paragraph, as follows:

If Shelter Creek Condominium irrigation lines extend within the ROW, they will be removed and capped off prior to construction. The SFPUC will provide irrigation water to affected areas using baker tanks or water trucks, as needed.

The Draft EIR continues on page 3-24, under Surface Restoration and Revegetation, to describe the restoration process as "Vegetation would be monitored for up to a year to ensure it has become established. Permitted structures in the ROW that would be removed during construction would be replaced; however, unpermitted structures would not be replaced, in accordance with the SFPUC's Right-of-Way Encroachment Policy (SFPUC, 2007b)."

Surface Restoration and Revegetation on page 3-25 of the Draft EIR has been revised to include the following sentence at the end of the first paragraph, as follows:

Exceptions are the irrigation lines through the SFPUC ROW at the Shelter Creek Condominiums, which would be replaced if they are removed for construction, and the retaining wall in the SFPUC ROW, which would be replaced if necessary to provide slope stability.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

The SFPUC ROW Division will meet with individual property owners to discuss each party's expected impacts from this project. The SFPUC intends to outline and reach written agreement with property owners on these issues before the construction contract is opened for bid.

**Comment UT-4: Emergency water discharges during construction.**

What is the emergency plan for a sudden discharge of water from either pipe during the construction of the opposing pipe (from vibration or shock). Will the water be shut-off to both pipes during construction? (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

**Response UT-4**

The SFPUC will isolate pipelines as necessary. The SFPUC has existing emergency operations plans for pipeline closure in the event of pipeline failure (SFPUC, 2003). The proposed construction schedule on Figure 3-12 of the Draft EIR shows work on SAPL2 and SAPL3 staggered so that each pipeline could be in operation during construction of the other pipeline.

## 3.11 Biological Resources

**Comment BI-1: The approximately 300 trees to be removed at Millbrae in the SFPUC ROW should be replaced.**

3. The City requires that the approximate 300 trees to be removed as part of the project shall be replaced. These trees will be planted in other locations in the City. (*Khee Lim, City Engineer, City of Millbrae; letter, April 24, 2013*)

**Response BI-1**

The City and County of San Francisco's Environmental Planning Department and its environmental consultant contacted City of Millbrae staff regarding City requirements regarding tree replacement, and were referred to the City of Millbrae Tree Protection and Urban Forestry program, which applies only to street trees (Roche, 2011). The trees to be removed in the City of Millbrae are not street trees. They are primarily eucalyptus trees, with scattered oaks, between the rear yards of residences on Ridgeway Drive and the Lomita Avenue trail, and do not appear to fit the definition of street trees. In Section 4.14.3.4, page 5.14-36 of the Draft EIR, several potential environmental effects associated with removal of the trees and understory vegetation in the eucalyptus grove were identified: a decrease of food, shelter, and breeding habitat for wildlife species, including nest failure of raptors and migratory bird species by inadvertent destruction or disruption of nests bearing eggs or young. The removal of trees could also impact bats that may use hollowed trees for maternity roosting sites. Additionally, the removal of eucalyptus trees could destroy potential wintering habitat for the monarch butterfly. These potential impacts would be addressed through implementation of Mitigation Measure M-BI-1a: General Protection Measures; Mitigation Measure M-BI-1b: Worker Training and Awareness Program; Mitigation Measure M-BI-1c: Prepare and Implement a Vegetation Restoration Plan, the second bullet of

which reads, “The plan shall be developed with the intent to replace (to the extent possible) the function and values of trees removed during the construction project with plants that are acceptable for planting within the SFPUC ROW” (page 5.14-41); Mitigation Measure M-BI-1d: Minimize Disturbance to Nesting Birds and Raptors; Mitigation Measure M-BI-1e: Preconstruction Surveys for Special-Status Bats and Avoidance and Minimization Measures; Mitigation Measure M-BI-1f: Mitigation for the Mission Blue Butterfly; Mitigation Measure M-BI-1g: Mitigation for San Francisco Dusky-Footed Woodrat Middens; and Mitigation Measure M-BI-4: Replacement of Trees to be Removed (applicable to the San Bruno North site). Implementation of these mitigation measures “would address impacts on special-status wildlife that have potential to occur on the project sites, as well as impacts related to loss and disruption of breeding and foraging habitat for nesting birds, raptors, and bats by: requiring general protection measures; a worker training and awareness program; biological monitoring for certain species; exclusion fencing to keep certain species outside of the work areas; implementation of protocols if individuals are found in the project area during construction; and revegetation and site restoration, including measures to prevent the spread and introduction of harmful invasive plant species that could prevent the growth of native plant species necessary for the survival of some special-status species”(pages 5.14-38 and 5.14-39 of the Draft EIR).

The coast live oak woodlands located at the Millbrae site are protected under the Oak Woodlands Conservation Act, because the canopy cover is composed of greater than 10 percent oak (CRA, 2001). The approximately 0.36 acre of oak woodlands in the pipeline construction zone occurs where the larger area of live oak woodland abuts and somewhat intergrades with the adjacent eucalyptus grove. This 0.36-acre area of trees within the ROW would be removed. These oaks within the SFPUC ROW are at the periphery of the woodlands, and likely have diminished habitat value because they are immediately adjacent to the golf course fairway, which is routinely maintained. The removal of the 0.36-acre area conservatively represents approximately 2 percent of the larger oak woodland area within the contiguous 16.3-acre City of Millbrae open space area; as described on page 5.14-46 of the Draft EIR, “given the scale and quality of the impacted area, the removal of coast live oak woodlands within the project site would not result in a substantial loss or conversion of oak woodlands that would have a significant effect on the environment (CEQA public resources code §21083.4)...The less-than-significant impact on coast live oak woodlands at the Millbrae site would be further reduced by implementation of Mitigation Measure M-BI-1a: General Protection Measures, which would require the installation of exclusion fencing along the PPSU project work area boundaries adjacent to the oak woodlands to prevent construction personnel from damaging oak vegetation outside of the work area.”

For all of these reasons, replacement tree planting in Millbrae has not been identified as a mitigation measure in the Draft EIR.

**Comment BI-2: Clean Water Act Section 404(b)(1) Guidelines apply to the project.**

The Regional Water Board considers the following factors in determining the amount and type of mitigation required:

- The type of compensatory mitigation (e.g., off-site, out-of-kind);

- Differences between the aquatic resource functions lost at the impact site and the functions expected to be provided by the mitigation project;
- Temporal losses of aquatic resource functions (i.e., functions lost due to the passage of time between loss of the impacted aquatic resource and creation/restoration of the full-functioning mitigation project); and
- The difficulty, uncertainty, and likelihood of success of a mitigation project. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

### **Response BI-2**

These comments regarding Clean Water Act Section 404(b)(1) Guidelines are acknowledged. Impacts to aquatic resources would be minimized during the temporary removal of the culvert at the Colma site, and the concrete lined v-ditches at the Colma, San Bruno South, and Millbrae sites, by routing the flow (if any) around the construction area to a downstream location, followed by replacement of the culvert and v-ditches. Functions and values will not be impaired, and there will be no temporal losses of aquatic resource functions. This procedure is commonplace and highly successful. Please see Response AL-1, for a response regarding alternatives.

### **Comment BI-3: The Vegetation Restoration Plan should address mitigation for temporal losses and monitor success of tree species in riparian habitat for 10 years.**

The DEIR discusses the removal and replacement of riparian vegetation. This is considered a temporal impact that may require compensatory mitigation. The Revegetation Restoration Plan (Mitigation Measure M-BI-1c: Prepare and Implement a Vegetation Restoration Plan) should address mitigation for any temporal loss in riparian habitat function. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

#### **M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan**

Mitigation Measure M-BI-2b states that, “to ensure success, vegetation planted as part of the vegetation restoration plan will be monitored for 1 year following installation. In addition, monitoring shall be conducted for 5 years for any tree species planted (p. 5.14-48).” Given the uncertainty associated with restoration, Regional Water Board staff recommends minimal monitoring periods of 5 years for the herbaceous and shrub species in wetlands and riparian habitat and 10 years for tree species in riparian habitat. The additional monitoring period for tree species is because the root systems of tree species generally take longer to develop than herbaceous and shrub species and are more susceptible to impacts associated with weeds, herbivory (deer and rodent damage), and drought during the establishment period. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

### **Response BI-3**

Mitigation Measure M-BI-2a: Minimize Disturbance to Riparian Habitat and Restoration, and Mitigation Measure M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan, on pages 5.14-47 and 5.14-48 of the Draft EIR, provide adequate mitigation for the project’s temporary impacts to riparian habitat, and reduce the project’s impact to less-than-significant levels.

These measures would avoid impacts to Central Coast riparian scrub and to water quality in the drainage situated adjacent to the northwest end of the work area, by preventing runoff from entering nearby drainages and preventing construction personnel from impacting riparian vegetation outside of the specified work area. Replanting of native plant species as allowed by the Right-of-Way Integrated Vegetation Management Policy (SFPUC, 2007a) would restore riparian habitat in the project area.

Although removal of vegetation for construction would temporarily decrease the availability of food and shelter for wildlife in the construction zone, adjacent contiguous riparian habitat is available for displaced species. In addition, with implementation of mitigation measures identified in the Draft EIR, the natural drainage offsite would not be impacted by the proposed project. Therefore, temporal loss in riparian habitat function would be minimal, and compensatory mitigation during the 3.5-month construction period and re-establishment of plant species is not required.

The willows at the South San Francisco site addressed by Mitigation Measure M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan, on page 5.14-48 of the Draft EIR, lie primarily on the SFPUC ROW. Therefore, for at least the majority of the site, replacement will not include tree planting, because trees generally would not be replanted along the pipeline route due to the potential for roots to damage the pipeline. If tree species are included in the vegetation restoration plan for riparian habitat areas, SFPUC agrees to monitor those trees for 10 years.

Mitigation Measure M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan, the fourth bullet on page 1-73 and on page 5.14-48 has been revised as follows:

- To ensure success, vegetation planted as part of the vegetation restoration plan will be monitored for up to 5 years ~~1 year~~ following installation. In addition, monitoring shall be conducted for 5 years for any tree species planted; except for tree species planted in riparian habitat, for which the monitoring period shall be 10 years.

This revision does not change the analysis or conclusions presented in the Draft EIR.

## 3.12 Geology and Soils

### **Comment GE-1: Assure structural stability of the existing retaining wall.**

*Impact C-GE Cumulative Impacts to Geology and Soils:* Replacement of the Colma SAPL2 line within the SFPUC right-of-way will require significant excavation to depths of more than 16', in close proximity to an existing retaining wall that supports a car dealership and other improvements above the site. It is not clear if the SFPUC will be submitting grading plans or other plans or reports to the town for review. The EIR does not address measures that will be taken to assure structural stability of this wall. The Final EIR should address this issue. Impact GE-4 states that there is a less than significant impact for the Colma site becoming unstable during project operations. This should be a potentially significant impact with appropriate mitigation. The Town of Colma requires that the SFPUC indemnify the Town for damage created by any aspect of the project. (*Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013*)

**Response GE-1**

As described under Trench Excavation and Shoring, in Section 3.8.1.1, Common Construction Elements for Pipeline Replacement, on page 3-24 of the Draft EIR, “The sidewalls of trenches would be stabilized using standard shoring methods, in accordance with the SFPUC’s Health and Safety requirements and the California Occupational Safety and Health Administration’s requirements (California Code of Regulations Title 8, Chapter 4, Section 1541).” The shoring design, which will be approved by a licensed civil engineer, will incorporate the weight (surcharge) associated with the retaining wall at the Colma site, so as not to affect the stability of the wall. The shoring plan can be provided to the City of Colma prior to construction. Because there will be no changes to the retaining wall itself, and because existing contours will be restored after construction is completed, site conditions after construction would be essentially identical to pre-construction conditions. The commenter has not provided evidence to support the assertion that this is a potentially significant impact, and no significant impacts are anticipated for the reasons discussed above.

Therefore, because the shoring design would take into account the weight of the adjacent retaining wall at the Colma site during construction, and because no conditions post-construction would affect the stability of the retaining wall, no mitigation is required.

SFPUC will discuss indemnification with the Town of Colma during the memorandum of agreement. This issue does not pertain to the adequacy or accuracy of the EIR, and this response is provided for information purposes only.

**Comment GE-2: Concern about soils at Shelter Creek and pipe materials. Suggestion to extend pipe replacement to driveway.**

We did not see anything about soil testing. Shelter Creek has areas that react with metal. We understand that the replacement pipes are to be stainless steel with a concrete jacket, but what about the part of the old pipes where the joining will be. Is it possible that the length of the two new sections could be extended to at least driveway 3, in case of any further problems. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

**Response GE-2**

Regardless of the type of soil that is present at the project sites, pipe design, trench preparation, and post-construction monitoring and inspections would ensure the long-term pipe durability and strength. The replacement pipe would be made of thick-walled steel pipe, and coated and lined with an epoxy material to prevent corrosion. Additionally, the joint between the new and existing pipe has been designed to provide corrosion protection. Trench preparation includes removal of existing soils during excavation, placement of appropriate materials and soils to serve as the pipe support in the trench, and backfill with appropriate soils to fill the trench (typically a minimum of 1.5 feet on either side and a minimum of 3 feet on top of the pipe). Corrosion monitoring locations would be installed along the replacement pipe, to allow for detection of any changes to the pipe. In the first 2 years after final construction, and approximately every 10 to 15 years thereafter, inspections would entail physically entering the manholes for visual inspections inside the pipelines. Therefore, the corrosivity of existing soils would not substantially impact the pipeline.

The determination of the length of the pipeline to be replaced was based on modeling of the pipeline's response to ground displacements potentially caused by a fault offset, as described in Response ES-11.

Geotechnical investigations have been completed for the PPSU project, including soil testing for corrosivity, and are summarized in the Draft EIR. Additional soil testing is not required. Text has been added to the Draft EIR to clarify the findings of the geotechnical studies with respect to corrosive soils.

Section 5.15.1.5, Geologic Hazards, Expansive/Corrosive/Collapsible Soils, on page 5.15-17 of the Draft EIR, immediately following the second bullet on the page, has been revised as follows:

Except for corrosivity, the soils data, described below, do not indicate that these types of geologic hazards would occur at the PPSU project sites.

A new paragraph has been added to the Draft EIR on page 5.15-18, after the third paragraph from the top of the page, as follows:

The geotechnical studies completed for the project indicate that portions of the sites are corrosive to ferrous metals and also detrimental to concrete structures (GTC, 2011a, GTC, 2011b, and GTC, 2011c).

Impact GE-5: The proposed project would not be located on expansive soils that could create substantial risks during project operations, on page 5.15-28 of the Draft EIR, has been revised as follows:

Problematic soils, including expansive and corrosive soils, can cause damage to improperly designed structures and facilities, potentially requiring repairs, and/or increasing the need for maintenance. Although clay-rich zones within Franciscan bedrock may be expansive, project-specific geotechnical studies (GTC, 2011b, 2011c, 2011d) have not identified any substantial hazards associated with shrink-swell potential in native soils at the PPSU sites. The geotechnical studies identified areas of the project sites that are corrosive to ferrous metals and also detrimental to concrete structures. Recommendations from the site-specific geotechnical investigations conducted to support construction activities would reduce potential impacts related to corrosive soils (GTC, 2011a, GTC, 2011c). Measures to be incorporated in the design of the pipelines and appurtenant structures, and which would provide protection from corrosive subsurface conditions, would include, as applicable: consultation with the corrosion engineer for further recommendations regarding backfilling the pipe for issues related to corrosivity of soils and corrosion protection; precautions to avoid damaging the pipe corrosion protection with construction equipment; additional field testing to further evaluate the site, as needed; increased steel thicknesses, increased concrete cover, low water/cementitious materials ratio in concrete, encasement with protective epoxy, and cathodic protection. These requirements would be implemented for the project as described in Section 3.8 of the Project Description (page 3-22). Therefore, the PPSU project would have a *less-than-significant* impact due to expansive or corrosive soils.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment GE-3: Retaining wall and recycling enclosure within the SFPUC ROW should be assessed by a soil engineer.**

It appears that the recycling enclosure is built on the right-of-way. The part of the retaining wall that is located on the right-of-way is problematic. I understand that a soil engineer will probably have to be called in to assess the situation. This issue will have to be followed up on. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

**Response GE-3**

The SFPUC's Right-of-Way Encroachment Policy (SFPUC, 2007b) prohibits structural improvements on the SFPUC ROW, and enforces the reservations and conditions described for each property for which a SFPUC ROW easement is recorded. The policy is intended to protect the SFPUC's water-storage and transmission facilities from damage, and to ensure access to all facilities and pipelines for maintenance, repair, replacement, or future enhancement. Prior to implementation of the proposed PPSU project, the SFPUC plans to review encroachments that impair access to the pipelines, and assess its ability to maintain and improve them.

The SFPUC has held several meetings with Shelter Creek Condominiums representatives as of May 2013 to discuss the project and encroachment issues (Zhang, 2013). The PPSU project would not re-grade the slope at Shelter Creek Condominiums. Text has been added to the Project Description, Section 3.8.1.1, Common Construction Elements for Pipeline Replacement, to address the retaining wall.

Site Mobilization and Preparation on page 3-23 of the Draft EIR has been revised to include the following text after the third sentence within the first paragraph, as follows:

At Shelter Creek Condominiums (San Bruno South site), a retaining wall and garbage enclosure are located in the SFPUC ROW. During project construction, the retaining wall would be removed and the garbage receptacles would be relocated to an alternative location in the condominiums. If needed, temporary shoring would be used to support the slope during construction.

See Response UT-3 above, which provides revisions to the Draft EIR regarding replacement of the retaining wall in the SFPUC ROW at the Shelter Creek Condominiums.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

## 3.13 Hydrology and Water Quality

**Comment HY-1: The Town of Colma and sewer districts must approve discharges to the storm drain or sanitary sewer systems.**

*Mitigation Measure HY-1: Implementation of a Storm Water Pollution Prevention Plan.* The Town welcomes the opportunity to review and comment on the plan to assure that illicit discharges are not made into any Town storm drain facilities. Town and the sewer districts approval for any



discharges to the storm drain or sanitary sewer system are required. (*Michael P. Laughlin, AICP, City Planner, Town of Colma Planning Department; letter, April 29, 2013*)

### Response HY-1

The Town of Colma will be provided with the opportunity to review and comment on the SWPPP.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, on page 1-89 and page 5.16-19 of the Draft EIR, has been revised to include the following sentence after the last bullet in the mitigation measure, as follows:

The SWPPP will be provided for review and comment, upon request, to the jurisdictions in which the project is located.

This revision does not change the analysis or conclusions presented in the Draft EIR.

### Comment HY-2: Dewatering discharges must be approved by the sanitary sewer agency, or other methods employed.

#### Dewatering Effluent

The DEIR states that, “dewatering may be required for groundwater, rainwater, or other water that enters the trenches and pits. Water that is pumped out of the trench or pit would be stored, tested, and treated to meet required standards, then discharged to a nearby sanitary sewer, stormwater culvert, creek, or overland (p. 5.16-20).” For any site dewatering activity, whether or not there is known soil contamination at the site, dewatering discharges may be contaminated. As a first choice, water should be discharged to the sanitary sewer, assuming approval can be obtained from the sanitary sewer agency. If approval to discharge to the sanitary sewer cannot be obtained then the water should be used onsite for dust control or for other uses. If the water is not needed for onsite use, then the water should be discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC should implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. In addition, the SFPUC should confirm that the discharge will not cause erosion, flooding or other problems. Section 5.16 Hydrology and Water Quality should be revised to reflect the Regional Water Board preference hierarchy for dewatering discharges. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

### Response HY-2

To clarify Impact HY-3: Discharges of dewatering effluent from excavated areas during project construction would not substantially degrade water quality, Section 5.16.3.4, Construction Impacts and Mitigation Measures, on page 5.16-20 of the Draft EIR, has been revised as follows:

Water that is pumped out of the trench or pit would be stored, tested, and treated to meet required standards, then 1) discharged to a nearby sanitary sewer, once the capacity of the system is verified with the appropriate agency; stormwater culvert, creek, or overland. 2) used on site for dust control or for other uses; or 3) discharged to a vegetated

upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC would implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. All discharges would be made in such a manner as to not cause erosion, flooding, or other problems. Construction dewatering associated with the project would be temporary and have a short duration.

In addition, Section 3.8.5, Dewatering, on page 3-30 of the Draft EIR, has been revised as follows:

During construction, dewatering may be required for groundwater, rainwater, or other water that enters the trenches and pits, such as from potential pipe leakage at upstream valves. Once this water is pumped out of the trench or pit, it would be stored, tested, and treated to meet required standards, then 1) discharged to a nearby sanitary sewer, once the capacity of the system is verified with the appropriate agency; ~~stormwater culvert, creek, or overland.~~ 2) used onsite for dust control or for other uses; or 3) discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC would implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. All discharges would be made in such a manner as to not cause erosion, flooding, or other problems. Discharge rates would not exceed 3,500 gallons per minute per pipeline. The construction contractor would be responsible for requesting a permit from the appropriate wastewater agency prior to discharge to the sanitary sewer. Discharge of water from dewatering activities must be performed in accordance with the requirements of the Statewide General Construction Permit for Stormwater Discharges Associated with Construction Activity issued by the SWRCB, the SWRCB's NPDES General Permit (Order 2003-0003-DWQ) for low-threat water quality discharges to land, and municipal stormwater permits.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment HY-3: Revise Mitigation Measure M-HY-1 to be consistent with the Construction General Permit requirements.**

Consistency with Construction General Permit

The Project will be covered under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity, State Water Resources Control Board Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ (Construction General Permit). The DEIR Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan should be revised to be consistent with the requirements of the Construction General Permit.

Mitigation Measure M-HY-1 discusses erosion and sedimentation BMPs including, "stabilize and revegetate disturbed areas as soon as possible after construction by planting or seeding and/or using mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material) (p. 5.16-16)." Mitigation Measure M-HY-1 should be revised to be consistent with the Construction General Permit requirement: "LUP [linear underground/overhead projects] dischargers shall provide effective soil cover for inactive<sup>1</sup> areas and all finished slopes, and utility backfill."

Also, Mitigation Measure M-HY-1 should be revised to be consistent with the Construction General Permit requirement for the installation of temporary slope breaks. The Construction General Permit requires all linear underground/overhead projects type 2 and 3 and traditional construction projects with risk level 2 and 3 to apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with the sheet flow lengths shown in Table 1 (regardless of proximity to a water body, wetland, or road crossing).

**Table 1: Critical Slope/Sheet Flow Length Combinations in Construction General Permit**

Slope percentage	Sheet flow length not to exceed
0-25%	20 feet
25-50%	15 feet
Over 50%	10 feet

Accordingly, the DEIR Mitigation Measure M-HY-1 should include slope breaks as a BMP (e.g., “install slope breakers at spacing intervals required by the RWQCB”). (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

The DEIR discusses emergency notification procedures, “immediately notify the RWQCB and other agencies as required (e.g., California Department of Fish and Wildlife) of any spill of petroleum products or other organic or earthen materials, and undertake corrective action (p. 5.16-18).” We remind the SFPUC that Health and Safety Code<sup>2</sup> requires notification to the California Emergency Management Agency (CalEMA) of any release of a hazardous material<sup>3</sup> into the environment. The DEIR should discuss notification to CalEMA as a mitigation measure for any spill of hazardous material. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

<sup>1</sup> Areas of construction activity that have been disturbed and are not scheduled to be re-disturbed for at least 14 days.

<sup>2</sup> California Health and Safety Code Title 19, Div. 2, Chapter 4, Section 2703: “A person shall provide an immediate, verbal report of any release or threatened release of a hazardous material to the administering agency and the California Emergency Management Agency as soon as: (1) a person has knowledge of the release or threatened release; (2) notification can be provided without impeding immediate control of the release or threatened release; (3) notification can be provided without impeding immediate emergency medical measures.”

<sup>3</sup> The Porter-Cologne Water Quality Control Act defines a “hazardous substance” for discharge to surface waters, any substance determined to be a hazardous substance pursuant to Section 311(b)(2) of the Federal Water Pollution Control Act (33 U.S.C. Sec. 1251 et seq.). The Porter-Cologne Water Quality Control Act defines a “hazardous substance” for discharge to surface waters, any substance determined to be a hazardous substance pursuant to Section 311(b)(2) of the Federal Water Pollution Control Act (33 U.S.C. Sec. 1251 et seq.).

### Response HY-3

For consistency with Construction General Permit requirements, the following text changes have been made to Section 5.16.3.4, Hydrology and Water Quality, Construction Impacts and Mitigation Measures, Mitigation Measure M-HY-1 in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan has been revised with the addition of two new bullets under Erosion and Sedimentation, on page 1-84 and page 5.16-16 of the Draft EIR:

- LUP [linear underground/overhead projects] dischargers shall provide effective soil cover for inactive areas and all finished slopes, and utility backfill.
- Install slope breakers at spacing intervals required by the RWQCB.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, has also been revised with additional text added to the last bullet under Permitting, Monitoring, and Reporting on page 1-88 and page 5.16-18:

- Immediately notify the RWQCB and other agencies as required (e.g., California Department of Fish and Wildlife, California Emergency Management Agency) of any spill of petroleum products or other organic or earthen materials, and undertake corrective action.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

**Comment HY-4: Dechlorination procedures should incorporate revised standard operating procedures as coordinated with the RWQCB.**

Planned Pipeline Discharges

The DEIR states that: “During pipeline shutdown, water would be drained from sections of the pipelines and would be discharged to the nearest storm drain system, open channel, natural creek, or overland in accordance with the San Francisco RWQCB Waste Discharge Requirements of Order No. R2-2008-0102 (RWQCB, 2008), which stipulates requirements related to discharges of water from the SFPUC’s water transmission system, including dechlorination requirements, flow rates, effluent limitations, and monitoring” (p. 5.16-21).

We remind the SFPUC that, as a result of recent dechlorination problems on San Mateo Creek and resulting fish kills, the Regional Water Board has been coordinating with the SFPUC on revising the standard operating procedures for dechlorination during planned discharges from the drinking water transmission system pipeline. Lessons learned from recent planned and unplanned discharge events on San Mateo Creek should be incorporated into the dechlorination procedures for the Project.<sup>2</sup> (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

**Response HY-4**

To date, no revised standard operating procedures have been developed. The SFPUC is coordinating closely with the appropriate agencies to address recent dechlorination issues, and would comply with any future requirements.

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<sup>2</sup> For further information on Regional Water Board requirements related to Waste Discharge Requirements for the San Francisco Public Utilities Commission Drinking Water Transmission System (NPDES Permit for WISP Order No. R2-2008-0102, NPDES No. CA0038857) contact Vince Christian (Vince.Christian@waterboards.ca.gov; 510-622-2336).

**Comment HY-5: Water table levels at Shelter Creek Condominiums and concerns regarding trenching.**

Also the level of the water table on the property in some places is very close to the surface especially in winter. SC was built on a swamp like area. In winter, the water table actually comes so near the surface under Garage 5, that water has been known to seep up through any cracks in the concrete floor. I understand that a well has been dug near the recycling enclosure. Do we know the what it shows considering the trenches are going down to about 30 ft. (*Shelter Creek Condominiums Board of Directors; letter, April 26, 2013*)

**Response HY-5**

In September 2010, GTC drilled two borings at the Shelter Creek Condominiums. One boring (GTC-S7) was drilled in the uncovered parking lot, and the other (GTC-S8) was drilled on Shelter Creek Lane near the entrance to the condominiums. The boring in the parking lot was drilled to a depth of 49.4 feet below ground surface (bgs) (ground surface elevation for boring GTC-S7 is 216.84 feet); no groundwater was encountered during drilling. The boring on Shelter Creek Lane was drilled to a depth of 41.5 feet bgs (ground surface elevation for boring GTC-S8 is 200.23 feet); no groundwater was encountered during drilling. A piezometer was installed in boring GTC-S7. This piezometer was monitored four times (October 1, 2010; December 22, 2010; January 27, 2011; and March 8, 2011), and no groundwater was detected between 14 and 48 feet bgs.

The expected maximum depth of excavation for the San Bruno South site is 32 feet bgs. Based on the results of the September 2010 borings and the four piezometer readings in late 2010 and early 2011, groundwater would not be expected to be encountered in the trenches in the vicinity of the condominiums. However, as stated on page 5.16--0 T

construction activities by requiring the SFPUC or its contractor to prepare a SWPPP detailing the construction BMPs that would be implemented during construction to control erosion and sedimentation of receiving water bodies, and minimize the risk of hazardous material release to surface water bodies.”

Please see Response GE-3 regarding the retaining wall. Please see Response PD-7 for information regarding removal of vegetation and erosion.

## 3.14 Alternatives

### **Comment AL-1: Clean Water Act Section 404(b)(1) Guidelines apply to the project.**

The Regional Water Board adopted U.S. Environmental Protection Agency’s Section 404(b)(1), “Guidelines for Specification of Disposal Sites for Dredge or Fill Material,” dated December 24, 1980, in its Basin Plan (Water Quality Control Plan for the San Francisco Bay Region) for determining the circumstance under which filling of wetlands, streams or other waters of the State may be permitted. Section 404(b)(1) Guidelines prohibit all discharges of fill material into regulated waters of the United States, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative (LEDPA) that will achieve the basic project purpose.

The Guidelines sequence the order in which proposals should be approached: 1) Avoid – avoid impacts to waters; 2) Minimize – modify project to minimize impacts to waters; and, 3) Mitigate – once impacts have been fully minimized, compensate for unavoidable impacts to waters. When it is not possible to avoid impacts to water bodies, disturbance should be minimized. Mitigation for lost water body acreage and functions through restoration or creation should only be considered after disturbance has been minimized. Where impacts cannot be avoided, the creation of adequate mitigation habitat to compensate for the loss of water body acreage, functions and values must be provided. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

### **Response AL-1**

The proposed project requires the repair of existing pipelines in fixed locations, which in a few instances convey water over or under wetlands or other waters. In Section 7.5, on pages 7-35 through 7-39, the Draft EIR describes six alternatives considered but rejected from further consideration, either because they would not meet the project goals or would not reduce environmental impacts compared to the proposed project. The No Project Alternative would not meet any of the project objectives, and could have greater effects on wetlands, streams and/or other waters if a large earthquake were to occur in the study area. The Sliplining Alternative would affect wetlands, streams, and/or other waters in a manner similar to the proposed project. Effects of the proposed project on these resources are minimal, involving removal and replacement of two underground culverts, and removal and replacement of small portions of concrete-lined stormwater v-ditches. Additionally, Mitigation Measure M-BI-3: Avoidance and Protection Measures for Jurisdictional Water Bodies, on pages 5.14-49 and 5.14-50, provides for erosion and sedimentation control measures, setbacks, fencing, and stabilization of exposed slopes.

The San Francisco Bay RWQCB's comments will be considered in the SFPUC's application for Clean Water Act Section 401 water quality certification, which is not a part of the CEQA process.

**Comment AL-2: The LEDPA analysis should consider alternatives to prevent fill in waters of the U.S.**

The LEDPA analysis should include alternatives with measures or combinations of measures that prevent the placement of fill in waters of the State. This analysis could include, in part, a study on the feasibility of eliminating culverts (where feasible), improving culvert design (i.e., increasing flood conveyance capacity, incorporating natural channel design features such as natural bed and bank, establishing riparian vegetation communities, etc.) when replacing sections of culvert, and replacing the v-ditches with vegetated v-ditches instead of replacing them in-kind. Any improvements to culvert design or elimination of portions of culverts may be considered a gain when calculating mitigation totals. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

While the DEIR includes an in-depth discussion of alternatives in Chapter 7, the LEDPA analysis that will eventually be submitted for the 401 water quality certification application will need to address the comments discussed above. CEQA can play a role in accomplishing the goals and requirements of the Regional Water Boards' Basin Plans. However, the alternatives analysis required by CEQA is not analogous to the alternatives analysis required by the Regional Water Board. CEQA and the Porter-Cologne Water Quality Control Act (Cal. Water Quality Control, Division 7) are different acts with different requirements and procedures. Therefore, the Regional Water Boards use their discretion when evaluating a CEQA alternatives analysis and may require additional analysis and information to satisfy the requirements of the Porter-Cologne Water Quality Control Act and the Basin Plan. (*Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board; letter, April 12, 2013*)

**Response AL-2**

The San Francisco Bay Regional Water Quality Control Board's comments are acknowledged, and will be considered in the SFPUC's application for Clean Water Act Section 401 water quality certification, which is not a part of the CEQA process.

**Comment AL-3: Should find another route for the project.**

My only hope is that you might find another route for this project, and my deep concern being a resident living on Ridgewood Drive. (*Clara R. Taylor; letter, April 16, 2013*)

**Response AL-3**

Because the objective of the project is to repair and rehabilitate existing pipelines, rerouting of the water would likely involve new construction to install new pipelines in previously undisturbed areas over a greater area than the proposed project, and would therefore cause more environmental impacts than those anticipated with the proposed project. This is described in Chapter 7, Alternatives, Section 7.5.6, Relocation Alternative (All Project Sites), on page 7-39, as follows: "The relocation of the existing pipelines to avoid crossing faults on the Peninsula was also considered as an alternative to address the hazards of earthquake

fault offset (Roche, 2011)... Because this alternative would be located outside of the existing SFPUC right-of-way, it would require the acquisition of new land and negotiation of new rights-of-way and would result in numerous environmental impacts associated with constructing new pipelines for approximately 17.8 miles. The design of the alignments under this alternative would be challenging due to the presence of existing development along this alignment and the need to cross major roadways. In addition, new wholesale customer connections would need to be installed along the new alignments: SAPL2 and SAPL3 would require approximately 16 connections and SSBPL would require approximately 7 connections. Construction of these connections would entail similar challenges to those described for the relocation of the pipelines. Therefore, because the relocation alternative would have substantially increased environmental impacts, substantially increased costs, and real estate and other logistical constraints, this alternative was rejected from further analysis.”

There are several construction access routes for the proposed project, as described in Section 3.8.7, Site Access and Construction Vehicle Routes, on page 3-33 of the Draft EIR. As shown on Figure 3-6 on page 3-9 of the Draft EIR, there are alternative construction routes to the Millbrae site; final selection of access routes will not be made until SFPUC has negotiated the use of staging areas. For purposes of the analysis in the EIR, which is conservative, it is assumed that each of the proposed staging areas would be used and each of the access routes would be needed.



# CHAPTER 4

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## Draft EIR Revisions

The following changes to the Peninsula Pipelines Seismic Upgrade (PPSU) project Draft Environmental Impact Report (EIR) have been made in response to comments received on the Draft EIR or have been initiated by the San Francisco Planning Department to clarify content, to add information received after publication of the Draft EIR, or to correct content in the Draft EIR. In addition, some of the text changes are proposed in response to comments received on the Draft EIR, as noted in Chapter 3, Comments and Responses. This chapter presents text revisions to the Draft EIR first, followed by revisions to figures in the Draft EIR.

This chapter identifies text changes by Draft EIR page number (or by the first page number if revisions have been made to multiple pages). Double-underlined text is used to represent language added or modified in the Draft EIR; ~~strikethrough~~ is used to represent language deleted from the Draft EIR. Revised graphics are shown with the word “Revised” next to the figure number. Staff-initiated changes to clarify information presented in the Draft EIR are highlighted by an asterisk (\*) in the left margin to distinguish them from text changes associated with responses to comments. None of the changes or clarifications presented in this chapter alters the conclusions or findings of the Draft EIR.

### 4.1 Text Revisions

#### 4.1.1 Chapter 1, Executive Summary

Section 1.5, Summary of Project Impacts and Mitigation Measures, on page 1-5 of the Draft EIR, has been revised to include the following text after the second sentence in the first paragraph:

Where called for, improvement measures are also identified in Chapter 5 to reduce the effects of impacts that would be less than significant. Table 1-2 summarizes these measures.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-LU-1a: Notice of Construction Activities, on page 1-6 of the Draft EIR has been revised to include a new second sentence in the first paragraph:

The SFPUC or its contractor will coordinate with the City of San Bruno to agree on a public notification process and notification boundaries in San Bruno.

This mitigation measure has also been revised so that the first bullet under item 1 on page 1-6 reads as follows:

- Colma Site – Kohl’s Department Store; Home Sweet Home Assisted Living Facility, if occupied; Creekside Villas, residential units in front of Kohl’s Department Store to the East; and Cypress Lawn Memorial Cemetery.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

The first paragraph in Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, on page 1-23 of the Draft EIR, has been changed as follows:

The SFPUC or its contractor(s) shall coordinate with the City of San Bruno and Caltrans, and the plan for maintaining access shall conform to the ~~State’s Manual of Traffic Controls for Construction and Maintenance Work Areas~~ California Manual on Uniform Traffic Control Devices (Caltrans, ~~2006~~2012).

These revisions do not change the analysis or conclusions presented in the Draft EIR.

The second paragraph in Mitigation Measure M-TR-3: Traffic Control Plan, on page 1-24 of the Draft EIR, has been revised as follows:

The [traffic control] plan shall conform to the California Manual on Uniform Traffic Control Devices ~~State’s Manual of Traffic Controls for Construction and Maintenance Work Areas~~ (Caltrans, ~~2012~~2006) and shall incorporate the applicable requirements of the jurisdictions of the Town of Colma and the cities of South San Francisco, San Bruno, and Millbrae. It shall be provided for review and comment if requested by these jurisdictions, where applicable.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following measure has been added to the first bullet related to the Colma site in Mitigation Measure M-TR-3, under Specific Measures for Project Sites, on page 1-26 of the Draft EIR:

At the Colma Site, flaggers shall be provided at the Serramonte Boulevard driveway to the staging area and Kohl’s department store site, to reduce the potential for conflicts between construction vehicles and customers accessing the Kohl’s parking lot via Serramonte Boulevard. If construction activities occur on weekends, flaggers shall also be provided.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-TR-3: Traffic Control Plan, on page 1-27 of the Draft EIR, the bullet for the San Bruno North site has been revised as follows:

- At the **San Bruno North site**, the construction contractor shall obtain an encroachment permit from Caltrans, and comply with Caltrans requirements for traffic control activities within the State right-of-way, as described in Section 3.10, Required Permits. ~~Construction worker parking on local residential streets shall be limited to 10 vehicles. The remaining workers shall park at the common staging area, and carpooling between the San Bruno North site and the common staging area shall be established.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

The following measures have been added to the fourth bullet related to the San Bruno South site to Mitigation Measure M-TR-3, under Specific Measures for Project Sites on page 1-27 of the Draft EIR:

At the San Bruno South site, SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (intersection #4), to determine whether construction vehicles traveling to the site spill back from the westbound left-turn lane onto San Bruno Avenue West, and develop strategies to reduce the potential for spillback. These strategies could include scheduling of construction vehicles to ensure arrival throughout the hour (rather than multiple trucks following each other); changes in signal timing during the nonpeak hours to provide additional green time for westbound traffic flow; requiring construction vehicles arriving via I-280 southbound to use the I-280 off-ramp at Cunningham Way; and other strategies developed with the City of San Bruno.

At the San Bruno South site, the SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the nonsignalized intersection of the I-280 ramps/Cunningham Way to determine whether traffic controls such as using a flagger or installing and operating a temporary traffic signal are warranted during PPSU San Bruno South construction activities.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-TR-3: Traffic Control Plan, on pages 1-29 and 1-30 of the Draft EIR, has been revised as follows:

- At the **Millbrae site**, the SFPUC or the construction contractor shall coordinate with the schedule of schools to minimize impacts on school operations to the maximum extent feasible. At the Millbrae site, to the maximum extent feasible, construction haul trips shall not be conducted prior to 9 a.m. or after 3 p.m. when children are traveling to and from the Meadows Elementary School and the Glen Oaks/Millbrae Montessori School. Similarly, if determined appropriate by the school administrators, the SFPUC or the construction contractor shall provide traffic control officers at the intersections of Helen Drive/Larkspur Drive (Intersection #9) near the Meadows Elementary School, and Santa Margarita Avenue/Capuchino Drive (Intersection #11) near the Glen Oaks/Millbrae Montessori School.

If sidewalk closures are required on Ridgewood Drive, pedestrian detour routes shall be provided. ~~Construction worker parking shall be accommodated on street.~~

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text from Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on page 1-32 of Chapter 1, Executive Summary, of the Draft EIR, has been revised as follows:

The noise control plan shall contain performance standards based on the more-restrictive of the 60-dBA [A-weighted-decibels]  $L_{eq}$  [equivalent continuous noise level] sleep interference threshold (applicable to nighttime construction), the 70-dBA  $L_{eq}$  speech interference threshold (for daytime construction), and the limits established in noise ordinances of San Mateo County, the Town of Colma, and the cities of San Bruno and Millbrae. The noise control plan shall identify the applicable threshold for each project site.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text on page 1-34 of Chapter 1, Executive Summary, of the Draft EIR has been revised as follows.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls:

- d) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. ~~to~~ and 5 p.m., except in the City of San Bruno, where such equipment shall be limited to the hours between 9 a.m. and 5 p.m.; and in the City of Millbrae, where such equipment shall be limited to the hours between 8 a.m. and 5 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, has also been revised on page 1-35 of the Draft EIR, as follows:

- f) Erect temporary noise barriers to maintain construction noise levels at or below the performance standards. Barriers shall be constructed with a solid material, with a density of at least 2 pounds per square foot and no gaps. The location, height, and specification of the barriers shall be determined by the approved noise consultant as part of the noise control plan.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on page 1-36 of the Draft EIR, has also been revised as follows:

- i) For the limited locations where the contractor is unable to mitigate noise through the measures described above (a through h), the contractor shall work with the SFPUC communications liaison and construction management team to provide alternative solutions. The contractor will provide a white noise machine<sup>1</sup> to residents adjacent to the construction work area whose exterior nighttime noise level due to project construction activities exceeds 60 dBA, or exceeds the daytime speech interference threshold of 70 dBA  $L_{eq}$ . Exceedances of the dBA criterion shall first be verified by field acoustical measurements. On a case-by-case basis, when the white noise machine does not provide an effective solution and when there are special circumstances such as those home

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<sup>1</sup> A white noise machine is a device that produces a soothing humming or a fan-like sound.

owners with verified special medical conditions or those who work at night and therefore need to sleep during daytime hours, the SFPUC will offer to temporarily relocate them to a nearby hotel. Special medical conditions shall be verified by a doctor.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-3a: Limit Hours of Construction at Colma Site, on page 1-38, has been revised as follows:

This mitigation measure applies to the Colma site. Any construction work conducted within the Town of Colma shall be limited to the hours established in the Town noise ordinance (weekdays 7:00 a.m. to 8 p.m. and ~~Saturdays~~ weekends 10 a.m. to 6 p.m.), unless determined otherwise by the Colma building official.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-3b: Limit Hours of Construction at Millbrae Site, on page 1-38 of the Draft EIR, has been revised as follows:

This mitigation measure applies to the Millbrae site. Except for dewatering activities, any construction work conducted within the City of Millbrae shall be limited to the following hours: weekdays 8 a.m. to 6 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m.) ~~established in the which is in compliance with the City noise ordinance (weekdays 7:30 a.m. to 7 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m.)~~.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 1-40 of the Draft EIR, has been revised as follows:

b) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. and ~~5:40 p.m.~~ except in the City of San Bruno and the City of Millbrae where such equipment shall be limited to the hours between 9 a.m. and 5 p.m. and between 8 a.m. and 5 p.m., respectively.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 1-40 of the Draft EIR, has been revised as follows:

f) Weekly reporting of the vibration monitoring results, including distribution of reports to interested parties that have requested them.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-UT-1e: Ensure Prompt Reconnection of Utilities, on page 1-49 of the Draft EIR, has been revised to include a new second sentence as follows:

Any utilities inadvertently damaged during construction shall be repaired to pre-project conditions.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan, the fourth bullet on page 1-73 of the Draft EIR, has been revised as follows:

- To ensure success, vegetation planted as part of the vegetation restoration plan will be monitored for up to 5 years ~~1 year~~ following installation. In addition, monitoring shall be conducted for 5 years for any tree species planted; except for tree species planted in riparian habitat, for which the monitoring period shall be 10 years.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan has been revised with the addition of two new bullets under Erosion and Sedimentation, on page 1-84 of the Draft EIR:

- LUP [linear underground/overhead projects] dischargers shall provide effective soil cover for inactive areas and all finished slopes, and utility backfill.
- Install slope breakers at spacing intervals required by the RWQCB.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, has also been revised with additional text added to the last bullet under Permitting, Monitoring, and Reporting on page 1-88 of the Draft EIR:

- Immediately notify the RWQCB and other agencies as required (e.g., California Department of Fish and Wildlife, California Emergency Management Agency) of any spill of petroleum products or other organic or earthen materials, and undertake corrective action.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, on page 1-89 of the Draft EIR, has been revised to include the following sentence after the last bullet in the mitigation measure, as follows:

The SWPPP will be provided for review and comment, upon request, to the jurisdictions in which the project is located.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The Draft EIR has been revised to include the following new Table 1-2 on page 1-99.

**Table RTC 4-1**  
**Summary of Improvement Measures for Proposed Project (Table 1-2)**

<b><u>Improvement Measures</u></b>	<b><u>Applies to Project Site</u></b>
<b><u>Section 5.6: Transportation and Circulation</u></b>	
<p><b><u>Improvement Measure I-TR-A: Pre-construction Parking Survey at San Bruno North Site</u></b></p> <p><u>Develop and implement a pre-construction survey of on-street parking supply and demand during the time frames when construction workers are expected to park in the vicinity of the San Bruno North site. The pre-construction on-street parking survey would be conducted on residential streets to the south of San Bruno Avenue West where on-street parking is permitted (for example, Cherry Avenue, Hickory Avenue, and Cedarwood Court), and results of the survey shall be submitted to the City of San Bruno. The SFPUC shall coordinate with the City of San Bruno regarding the feasibility and location of construction worker vehicle parking on residential streets.</u></p>	<p><u>San Bruno North site</u></p>
<p><b><u>Improvement Measure I-TR-B: Monitoring of Westbound Left-Turn Lane from San Bruno Avenue West onto Shelter Creek Lane</u></b></p> <p><u>At the San Bruno South site, SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), to determine whether construction vehicles traveling to the site spill back from the westbound left-turn lane onto San Bruno Avenue West, and develop strategies to reduce the potential for spillback. These strategies could include scheduling of construction vehicles to ensure arrival throughout the hour (rather than multiple trucks following each other); changes in signal timing during the nonpeak hours to provide additional green time for westbound traffic flow; requiring construction vehicles arriving via I-280 southbound to use the I-280 off-ramp at Cunningham Way; and other strategies developed with the City of San Bruno.</u></p>	<p><u>San Bruno South site</u></p>
<p><b><u>Improvement Measure I-TR-C: Coordinate On-street Parking at the Millbrae Site</u></b></p> <p><u>Coordinate with the City of Millbrae regarding construction worker vehicle parking on residential streets.</u></p>	<p><u>Millbrae site</u></p>
<p><b><u>Improvement Measure I-TR-D: Monitoring Plan for the Unsignalized Intersection of the I-280 Ramps/Cunningham Way</u></b></p> <p><u>At the San Bruno South site, the SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the unsignalized intersection of the I-280 ramps/Cunningham Way to determine whether traffic controls such as using a flagger or installing and operating a temporary traffic signal are warranted during PPSU San Bruno South construction activities.</u></p>	<p><u>San Bruno South site</u></p>

This revision does not change the analysis or conclusions presented in the Draft EIR.

The first sentence of the second paragraph under Section 1.6, Alternatives to the Proposed Project, on page 1-99 of the Draft EIR, has been revised as follows:

The impacts of the proposed project and those of the alternatives are summarized in Table 1-~~32~~.

The numbering for the Draft EIR Table 1-2, Comparison of Significant Impacts of the PPSU Project to Impacts of Alternatives, on pages 1-100 through 1-102 of the Draft EIR, has been revised as follows:

Table 1-~~32~~, Comparison of Significant Impacts of the PPSU Project to Impacts of Alternatives

These revisions do not change the analysis or conclusions presented in the Draft EIR.

## 4.1.2 Chapter 2, Introduction

Chapter 2, Section 2.2.3, Regional Water System Facilities, of the Draft EIR has been revised to include the following text before the last sentence of the first full paragraph on page 2-7:

The Tesla Treatment Facility, California's largest ultraviolet (UV) water disinfection facility and the third-largest facility of its kind in the nation, consists of a 20,000-square-foot building that will use a series of UV light arrays to treat water from the Hetch Hetchy Reservoir, in Yosemite National Park in the Sierra Nevada Mountains. The facility will treat up to 315 million gallons of water per day. UV disinfection is applied as an additional treatment mechanism for the Hetch Hetchy water supply to comply with U.S. EPA's new regulation requiring a second disinfectant for all unfiltered drinking water systems, effective April 2012. At the Tesla Portal, the chlorinated Hetch Hetchy water enters the 25-mile-long Coast Range Tunnel and is conveyed west to the Alameda East Portal in the Sunol Valley, which connects the Coast Range Tunnel to the Alameda Siphons.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

In Chapter 2, Section 2.2.3, Regional Water System Facilities, the following has been added after the first sentence of the second full paragraph on page 2-7:

The Alameda Siphons are three parallel pipelines that extend approximately 3,000 feet from the Alameda East Portal across the Sunol Valley and beneath Alameda Creek to the Alameda West Portal. The Alameda Siphon No. 4 Project extends approximately 3,000 feet from the Alameda East Portal across both the Calaveras Fault and Alameda Creek to the Alameda West Portal. The project consists of a 66-inch-diameter welded steel pipeline with 310 feet of a seismically-designed special trench thicker-walled pipe in the fault rupture zone, and a tunnel crossing under Alameda Creek; and a 96-inch-diameter "blending structure," consisting of a pipe and valve manifold near the Alameda West Portal, which will blend water from the Sunol Valley Water Treatment Plant and Hetch Hetchy, so that the existing and new Irvington Tunnels will receive a uniform quality of water.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

## 4.1.3 Chapter 3, Project Description

Section 3.5.4, San Bruno South Site, on page 3-19 of the Draft EIR has been revised as follows:



Open-trench construction techniques would be used; a portion of the pipeline would be installed at a lower elevation than the existing pipeline, as shown on Figure 3-10. The new alignment of the pipeline would be at depths similar to those described above for SAPL2. A normal trench would be used for the length of the new pipeline. In addition, the project would include replacement of the existing pipe and valves connecting the customer service connection, approximately 65 feet south of Whitman Way.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* Section 3.5.5, Millbrae Site, on page 3-19 of the Draft EIR, has been revised to include information about the waters of the State and the United States, as follows:

Two concrete v-ditches designed to carry runoff from adjacent slopes (one at the end of Bertocchi Lane and one behind residences on Ridgewood Drive) would be removed for construction activities. After completion of the pipeline replacement, the SFPUC would replace the v-ditches in kind. The v-ditches are considered waters of the State of California, under the jurisdiction of the RWOCB.

A third concrete-lined ditch is located at the eastern end of Larkspur Drive. Water in this ditch issues from two culvert pipes from a residential development and flows approximately 600 feet downslope to the southeast, where it empties into Green Hills Creek. A portion of the ditch would be plated over to allow access to the project site via the Green Hills Country Club. This ditch conveys other waters of the United States, subject to the jurisdiction of the U.S. Army Corps of Engineers, as well as waters of the State of California, under the jurisdiction of the RWOCB.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Site Mobilization and Preparation, on page 3-23 of the Draft EIR, has been revised to include the following text after the third sentence within the first paragraph, as follows:

At Shelter Creek Condominiums (San Bruno South site), a retaining wall and garbage enclosure are located in the SFPUC ROW. During project construction, the retaining wall would be removed and the garbage receptacles would be relocated to an alternative location in the condominiums. If needed, temporary shoring would be used to support the slope during construction. If Shelter Creek Condominium irrigation lines extend within the ROW, they will be removed and capped off prior to construction. The SFPUC will provide irrigation water to affected areas using baker tanks or water trucks, as needed.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Chapter 3, Project Description, Trench Excavation and Shoring, on page 3-24 of the Draft EIR, has been revised as follows:

During nonwork hours, open trenches within the roadways, or as warranted along other areas with deep trenches, would be covered with steel plates; ~~and~~ trenches in other areas and work areas would be fenced off unless they are in the roadway. Prior to pipe installation, trenches would be prepared by installing materials that support the pipeline, such as sand or polystyrene slabs.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Surface Restoration and Revegetation on page 3-25 of the Draft EIR has been revised to include the following sentence at the end of the first paragraph, as follows:

Exceptions are the irrigation lines through the SFPUC ROW at the Shelter Creek Condominiums, which would be replaced if they are removed for construction, and the retaining wall in the SFPUC ROW, which would be replaced if necessary to provide slope stability.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* Section 3.8.1.1, Common Construction Elements for Pipeline Replacement, on page 3-25 of the Draft EIR, has been revised in the second paragraph under Creek Culvert Work at Colma Site to clarify the routing of water around the creek culvert, as follows:

*Creek Culvert Work at Colma Site*

If temporary piping is used, flexible piping would be installed between the upstream portion of the culvert and the downstream portion of the culvert at either end of the project site source of the water and a point of discharge—either a storm drain or another inlet to the culvert. If a cofferdam is used, a collection liner and shoring, such as sand bags or steel and wood, would be installed to collect the water in the culvert, which would then be pumped out and discharged through temporary piping to the downstream portion of the culvert at the edge of the project site a storm drain or another inlet to the culvert. Once the new water transmission pipe is installed, the culvert would be replaced in kind.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Section 3.8.5, Dewatering, on page 3-30 of the Draft EIR, has been revised as follows:

During construction, dewatering may be required for groundwater, rainwater, or other water that enters the trenches and pits, such as from potential pipe leakage at upstream valves. Once this water is pumped out of the trench or pit, it would be stored, tested, and treated to meet required standards, then 1) discharged to a nearby sanitary sewer, once the capacity of the system is verified with the appropriate agency; stormwater culvert, creek, or overland; 2) used onsite for dust control or for other uses; or 3) discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC would implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. All discharges would be made in such a manner as to not cause erosion, flooding, or other problems. Discharge rates would not exceed 3,500 gallons per minute per pipeline. The construction contractor would be responsible for requesting a permit from the appropriate wastewater agency prior to discharge to the sanitary sewer. Discharge of water from dewatering activities must be performed in accordance with the requirements of the Statewide General Construction Permit for Stormwater Discharges Associated with Construction Activity issued by the SWRCB, the SWRCB's NPDES General Permit (Order 2003-0003-DWQ) for low-threat water quality discharges to land, and municipal stormwater permits.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* Table 3-4, Proposed Construction Staging Areas under Section 3.8.6, Construction Staging and Spoils Areas, on page 3-31 of the Draft EIR, has been revised to correct the staging acres on the Green Hills Country Club, as shown below.

This revision does not change the analysis or conclusions presented in the Draft EIR.

**Table RTC 4-2**  
**Proposed Construction Staging Areas (Revised Table 3-4)**

Project Site	Staging Area	Approximate Size (acres)	Project Activities	Estimated Duration of Use
Colma	Kohl's Department Store parking lot	0.24	Laydown staging area and staff parking	2 months
	Vacant SFPUC ROW	0.53	Laydown staging area	2 months
	<b>Subtotal</b>	<b>0.77</b>		
South San Francisco	Pacific Supermarket parking lot	0.05	Laydown staging area and staff parking	3 months
	<b>Subtotal</b>	<b>0.05</b>		
San Bruno North	Vacant Caltrans property	0.14	Laydown staging area	1 month
	<b>Subtotal</b>	<b>0.14</b>		
San Bruno South	San Bruno Chinese Church parking lot	0.18	Laydown staging area	9 months
	Vacant SFPUC ROW along San Bruno Chinese Church	0.96	Spoils storage	9 months
	Peninsula High School parking lot	1.08	Laydown staging area and staff parking	9 months
	Vacant land along SFPUC ROW	0.09	Laydown staging area	9 months
	<b>Subtotal</b>	<b>2.31</b>		
Millbrae	City of Millbrae open space area	1.1	Laydown staging area	4.5 months <sup>1</sup>
	Green Hills Country Club/City of Millbrae property	0.62	Laydown staging area and vehicle access and turnaround	3 months
	Green Hills Country Club	0.31	Laydown staging area	3 months
	<b>Subtotal</b>	<b>2.03</b>		
<b>Common Staging Area</b>	Vacant land within SFPUC ROW on Baden Valve Lot	<b>0.32</b>	Construction offices and staff parking	12 months <sup>2</sup>
<b>All Project Sites</b>	<b>Total</b>	<b>5.62</b>		

Source: G&E Engineering Systems, Inc., 2012; PPSU project analysis, URS.

Notes:

<sup>1</sup> The duration of staging at the City of Millbrae open space area includes both the tree removal phase and project construction.

<sup>2</sup> The common staging area would be used for the duration of construction at all PPSU sites.

ROW = right-of-way

SFPUC = San Francisco Public Utilities Commission

The fourth bullet under Millbrae Site, on page 3-33 of the Draft EIR, has been revised as follows:

- For access through the SFPUC ROW from Ridgewood Drive, existing small structures, fences, landscaping, and other encroachments would be removed from the side yards of 1100 and 1094 Ridgewood Drive prior to commencement of construction. A permanent retaining wall with approximately 10-foot footings would be constructed under the existing back yard fence at 1094 Ridgewood Drive to shore up the slope prior to excavation of the pipeline. During construction, the existing grade behind 1094 Ridgewood Drive would be maintained through an engineered shoring system. A few sections of the existing fence may be temporarily removed during construction. Following the replacement of the pipeline, the grade and fence would be returned to existing conditions.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

A new sentence has been added after the second sentence at the top of page 3-33 of the Draft EIR (Section 3.8.7, Site Access and Construction Vehicle Routes, San Bruno South), as follows:

This alternative access would also be used for construction access by vehicles, but would not be used by heavy equipment such as haul trucks.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Section 3.8, first sentence of the first paragraph on page 3-36 of the Draft EIR, has been revised as follows:

Daytime construction activities would occur primarily during weekdays, from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

In Section 3.10, Required Permits, beginning on page 3-36 of the Draft EIR, a new second sentence has been added to the second bullet:

- **San Francisco Bay Regional Water Quality Control Board** – Compliance with the SFPUC’s existing NPDES permit for planned, unplanned, and emergency discharges from the drinking water transmission system. Potentially, a Report of Waste Discharge if the Project impacts waters of the State;

This revision does not change the analysis or conclusions presented in the Draft EIR.

Section 3.10.3, Local, fourth bullet on page 3-38 of the Draft EIR, has been revised as follows:

- **Various cities** – Haul permits, encroachment permits, temporary construction easements, tree removal permits for trees outside the SFPUC right-of-way, grading permits, sewer district approvals, and leases or other agreements as needed in connection with project construction; and

This revision does not change the analysis or conclusions presented in the Draft EIR.

## 4.1.4 Chapter 5, Environmental Setting, Impacts, and Mitigation Measures

### 4.1.4.1 Section 5.1, Overview

- \* On page 5.1-7 of the Draft EIR, the reference for the Harry Tracy Water Treatment Plant Long-Term Improvements Project in Table 5.1-1, Cumulative Project List, has been revised as follows:

The primary differences in treatment process resulting from the project would be changes to solids handling, whereby solids from the sludge holding tank would be transferred to a solids dewatering facility before being trucked off site, and to the treated water storage, which would occur in a single new tank north of the main plant site instead of two tanks southeast of the main plant (SF Planning, 2010~~2014~~).

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* On page 5.1-8 of the Draft EIR, the reference for the Harry Tracy Water Treatment Plant Long-Term Improvements Project in Table 5.1-1, Cumulative Project List, has been revised as follows:

Sources: SF Planning, 2010~~2014~~.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* On page 5.1-10 of the Draft EIR, the reference for the Harry Tracy Water Treatment Plant Long-Term Improvements Project EIR has been revised as follows:

SF Planning (City and County of San Francisco, San Francisco Planning Department), 2010~~2014~~. Harry Tracy Water Treatment Plant Long-Term Improvements Project, Final Draft-EIR. SCH No. 2008052106. October~~March~~.

This revision does not change the analysis or conclusions presented in the Draft EIR.

### 4.1.4.2 Section 5.2, Land Use and Land Use Planning

On page 5.2-10 of the Draft EIR, the second sentence of the second full paragraph has been revised as follows:

Work would take place primarily on weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-LU-1a: Notice of Construction Activities, on page 5.2-11, has been revised to include a new second sentence in the first paragraph:

The SFPUC or its contractor will coordinate with the City of San Bruno to agree on a public notification process and notification boundaries in San Bruno.

This mitigation measure has also been revised so that the first bullet under item 1 on page 5.2-11 reads as follows:

- Colma Site – Kohl’s Department Store; Home Sweet Home Assisted Living Facility, if occupied; Creekside Villas, residential units in front of Kohl’s Department Store to the East; and Cypress Lawn Memorial Cemetery.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

#### **4.1.4.3 Section 5.3, Aesthetics**

Page 5.3-27 of the Draft EIR has been revised to clarify the nature of the views as follows:

Because higher viewer sensitivity would primarily occur at the church and high school, where viewers are intermittent and views are of staging and spoils areas instead of construction; because most residents would primarily have limited views of construction activity ~~obstructed views~~ (rear views, fenced views, and parking lot views); and because views of construction would be temporary (less than 1 year), impacts to visual character would be *less than significant*.

This revision does not change the analysis or conclusions presented in the Draft EIR.

In Section 5.3.3.4, Construction Impacts and Mitigation Measures, under Impact AE-2, on page 5.3-29 of the Draft EIR, the first sentence of the last paragraph has been revised as follows:

As discussed in Section 3.8.9 in Chapter 3, Project Description, the majority of construction activities would occur on weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

~~; however, w~~ Weekend construction work may also be necessary.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

#### **4.1.4.4 Section 5.6, Transportation and Circulation**

In Section 5.6.1.2, Transportation and Circulation, Local and Site Access and Parking, San Bruno South site, on page 5.6-3 of the Draft EIR, a new sentence has been added after the second full sentence on page 5.6-3:

The portion of Courtland Drive between north of the San Bruno Chinese Church and Madison Avenue is not a City street.

This revision does not change the analysis or conclusions presented in the Draft EIR.

In Section 5.6.3.2, Approach to Analysis, on page 5.6-14 of the Draft EIR, the first sentence of the second full paragraph has been revised as follows:

Construction of the proposed project is estimated to require a total of 12 months to complete, and project construction would generally occur on weekdays between 7 a.m.

and 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

On page 5.6-14 of the Draft EIR, the sixth sentence of the last paragraph has been revised as follows:

Trucks delivering equipment and materials to the project area from offsite locations, and hauling excavated materials from the project area to offsite locations, would generally travel on weekdays between 7 a.m. and 5 p.m., with haul trips ceasing at 4:30 p.m. in San Bruno.

This revision does not change the analysis or conclusions presented in the Draft EIR.

On page 5.6-15 of the Draft EIR, note one in Table 5.6-7, A.M. and P.M. Peak Hour Construction Vehicles by Site, has been revised as follows:

<sup>1</sup> Construction activities would generally occur between 7 a.m. and 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

In Section 5.6.3.4, Transportation and Circulation, Construction Impacts and Mitigation Measures of the Draft EIR, the last two sentences of the first full paragraph on page 5.6-18 have been revised as follows:

As shown in Table 5.6-9, the results of the quantitative LOS analysis indicates that the addition of the construction-generated vehicle trips would not substantially affect existing traffic conditions, and all intersections would continue to operate at acceptable levels (i.e., at LOS D or better), except at the San Bruno North site. With the closure of both the right-turn lane of the I-280 off-ramp and the eastbound San Bruno Avenue West lane adjacent to the project site, the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) would operate at LOS E during the a.m. peak hour, which would not be an acceptable LOS. However, impacts related to simultaneous lane closures at this location would be reduced to a less-than-significant level with implementation of Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, which would allow the LOS at the intersection to be maintained at LOS D. Therefore, the impact from short-term increases in traffic volumes during construction at all PPSU project sites would be less than significant with mitigation.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, Colma Site, Parking Information, the following sentence has been added to the end of the last paragraph in that section, on page 5.6-20:

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, South San Francisco Site, Parking Information, the following sentence has been added to the end of the last paragraph in that section, on page 5.6-22:

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

In Section 5.6, the third sentence of the first paragraph in San Bruno North Site, Impacts on Roadways, page 5.6-22 of the Draft EIR, has been revised to read:

During the a.m. and p.m. peak hours, there would be a maximum of two construction truck trips accessing the project site, and 20 construction worker vehicle trips (the intersection impact analysis assumed that construction workers would drive to the site, but because a staging area would not be provided on site that would accommodate construction worker vehicle parking, and on-street parking is not permitted on San Bruno Avenue West, it is anticipated that construction workers would park at the common staging area, and carpool to the site in construction vehicles). A limited number of construction workers may park on residential streets south of San Bruno Avenue West.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

The second full paragraph on page 5.6-23 of the Draft EIR, has been revised for consistency with Table 5.6.9 in the Draft EIR as follows:

As indicated in Table 5.6.9, with the closure of both lanes, the intersection of I-280 Northbound ramps/San Bruno Avenue West (Intersection #3) would operate at LOS E during the a.m. peak hour, which would not be an acceptable LOS per San Francisco Planning Department or City of San Bruno traffic policy; during the p.m. peak hour it would operate at LOS DC, which would be considered an acceptable LOS.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The first paragraph in Mitigation Measure M-TR-1: Maintain Traffic Flow on San Bruno Avenue West During the A.M. Peak Hour, on page 5.6-24 of the Draft EIR, has been changed as follows:

The SFPUC or its contractor(s) shall coordinate with the City of San Bruno and Caltrans, and the plan for maintaining access shall conform to the ~~State's Manual of Traffic Controls for Construction and Maintenance Work Areas~~ California Manual on Uniform Traffic Control Devices (Caltrans, ~~2006~~2012).

These revisions do not change the analysis or conclusions presented in the Draft EIR.



- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, San Bruno North Site, Parking Information, the following sentence has been added to the end of the last paragraph in that section, on page 5.6-25 (first full paragraph at the top of the page):

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page 5.6-25 of the Draft EIR has been revised to include the following text after the first full paragraph at the top of the page:

Although the PPSU project would not have significant parking impacts, the following improvement measure has been included to address concerns related to on-street construction worker parking raised during the Draft EIR public review period.

**Improvement Measure I-TR-A: Pre-construction Parking Survey at San Bruno North Site**

Develop and implement a pre-construction survey of on-street parking supply and demand during the time frames when construction workers are expected to park in the vicinity of the San Bruno North site. The pre-construction on-street parking survey would be conducted on residential streets to the south of San Bruno Avenue West where on-street parking is permitted (for example, Cherry Avenue, Hickory Avenue, and Cedarwood Court), and results of the survey shall be submitted to the City of San Bruno. The SFPUC shall coordinate with the City of San Bruno regarding the feasibility and location of construction worker vehicle parking on residential streets.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Page 5.6-26 of the Draft EIR has been revised to include the following text after the last paragraph under San Bruno South site, Impacts on Roadways from Construction Traffic:

Although the PPSU project would not have significant traffic impacts at the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), the following improvement measure has been included to address concerns related to the left turn pocket from San Bruno Avenue to Shelter Creek Lane raised during the Draft EIR public review period.

**Improvement Measure I-TR-B: Monitoring of Westbound Left-Turn Lane from San Bruno Avenue West onto Shelter Creek Lane**

At the San Bruno South site, SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the intersection of Crestmoor Drive/San Bruno Avenue West/Shelter Creek Lane (Intersection #4), to determine whether construction vehicles traveling to the site spill back from the westbound left-turn lane onto San Bruno Avenue West, and develop strategies to reduce the potential for spillback. These strategies could include scheduling of construction vehicles to ensure arrival throughout the hour (rather than multiple trucks following each

other); changes in signal timing during the nonpeak hours to provide additional green time for westbound traffic flow; requiring construction vehicles arriving via I-280 southbound to use the I-280 off-ramp at Cunningham Way; and other strategies developed with the City of San Bruno.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, San Bruno South Site, Parking Information, the following sentence has been added as the last paragraph in that section, on the top of page 5.6-31:

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, Millbrae Site, Parking Information, the following sentence has been added at the end of the last paragraph in that section, on page 5.6-32:

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page 5.6-32 of the Draft EIR has been revised to include the following text after the last paragraph:

Although the PPSU project would not have significant parking impacts, the following improvement measure has been included to address concerns related to on-street construction worker parking raised during the Draft EIR public review period.

**Improvement Measure I-TR-C: Coordinate On-street Parking at the Millbrae Site**

Coordinate with the City of Millbrae regarding construction worker vehicle parking on residential streets.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.4, Construction Impacts and Mitigation Measures, Common Staging Area, Parking Information, the following sentence has been added, at the end of the paragraph on page 5.6-34:

Therefore, the PPSU project would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The second paragraph in Mitigation Measure M-TR-3: Traffic Control Plan, on page 5.6-36 of the Draft EIR, has been revised as follows:

The [traffic control] plan shall conform to the California Manual on Uniform Traffic Control Devices ~~State's Manual of Traffic Controls for Construction and Maintenance Work Areas~~ (Caltrans, 2012~~2006~~) and shall incorporate the applicable requirements of the jurisdictions of the Town of Colma and the cities of South San Francisco, San Bruno, and Millbrae. It shall be provided for review and comment if requested by these jurisdictions, where applicable.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following measure has been added to the first bullet related to the Colma site in Mitigation Measure M-TR-3: Traffic Control Plan, under Specific Measures for Project Sites, on page 5.6-37 of the Draft EIR:

At the Colma Site, flaggers shall be provided at the Serramonte Boulevard driveway to the staging area and Kohl's department store site, to reduce the potential for conflicts between construction vehicles and customers accessing the Kohl's parking lot via Serramonte Boulevard. If construction activities occur on weekends, flaggers shall also be provided.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-TR-3: Traffic Control Plan, on page 5.6-37 of the Draft EIR, the bullet for the San Bruno North site has been revised as follows:

- At the **San Bruno North site**, the construction contractor shall obtain an encroachment permit from Caltrans, and comply with Caltrans requirements for traffic control activities within the State right-of-way, as described in Section 3.10, Required Permits. ~~Construction worker parking on local residential streets shall be limited to 10 vehicles. The remaining workers shall park at the common staging area, and carpooling between the San Bruno North site and the common staging area shall be established.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-TR-3: Traffic Control Plan, on page 5.6-38 of the Draft EIR, has been revised as follows:

- At the **Millbrae site**, the SFPUC or the construction contractor shall coordinate with the schedule of schools to minimize impacts on school operations to the maximum extent feasible. At the Millbrae site, to the maximum extent feasible, construction haul trips shall not be conducted prior to 9 a.m. or after 3 p.m. when children are traveling to and from the Meadows Elementary School and the Glen Oaks/Millbrae Montessori School. Similarly, if determined appropriate by the school administrators, the SFPUC or the construction contractor shall provide traffic control officers at the intersections of Helen Drive/Larkspur Drive (Intersection #9) near the Meadows

Elementary School, and Santa Margarita Avenue/Capuchino Drive (Intersection #11) near the Glen Oaks/Millbrae Montessori School.

If sidewalk closures are required on Ridgewood Drive, pedestrian detour routes shall be provided. ~~Construction worker parking shall be accommodated on street.~~

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.6, Transportation and Circulation, Cumulative Impacts and Mitigation Measures, of the Draft EIR, on page 5.6-39, the second paragraph has been revised as follows:

As indicated in Table 5.1-1, the timelines are unknown at this time for construction of the new residential project and the classroom replacement project in San Bruno, and for the Safeway store replacement project in Millbrae; therefore, in the analysis below, the contribution of these projects to cumulative impacts during the PPSU project's 12-month construction period (i.e., between 2014 and 2015) is conservatively assumed to occur simultaneously with the PPSU project~~not known.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* In Section 5.6.3.6, Transportation and Circulation, Cumulative Impacts and Mitigation Measures, on page 5.6-41, Traffic Safety Hazards Impacts has been revised to include a new paragraph before the first full paragraph, as follows:

The Safeway Store Replacement project in Millbrae is approximately 1 mile east of the PPSU Millbrae site, and although both projects may share some of the same construction access routes between the project sites, particularly from U.S. 101, it is anticipated that the contribution of the PPSU Millbrae site (i.e., between 3 and 16 construction trucks per hour destined to and from the Millbrae site via both I-280 and U.S. 101) to the cumulative construction impacts in the vicinity of the Safeway Store Replacement project would be both temporary and minimal.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Page 5.6-41 of the Draft EIR has been revised to include the following text after Mitigation Measure C-TR: Assign SFPUC Water System Improvement Program Projects Construction Coordinator:

Although the PPSU project would not contribute considerably to the movements at the unsignalized intersection of the I-280 ramps/Cunningham Way, the following improvement measure has been included to address concerns raised during the Draft EIR public review period.

**Improvement Measure I-TR-D: Monitoring Plan for the Unsignalized Intersection of the I-280 Ramps/Cunningham Way**

At the San Bruno South site, the SFPUC shall, in coordination with the City of San Bruno, develop and implement a monitoring plan for the unsignalized intersection of the I-280 ramps/Cunningham Way to determine whether traffic controls such as

using a flagger or installing and operating a temporary traffic signal are warranted during PPSU San Bruno South construction activities.

This revision does not change the analysis or conclusions presented in the Draft EIR.

#### 4.1.4.5 Section 5.7, Noise

In Section 5.7.1.4, Noise and Vibration, Sensitive Receptors, of the Draft EIR, the last full sentence under Millbrae Site on page 5.7-14 has been revised as follows:

The nearest sensitive receptors are the single-family residences at 1094 and 1100 Ridgewood Drive, ~~both of which are~~ located 13 and 10 feet from the project site, respectively.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

On page 5.7-26 of the Draft EIR, the first sentence of the third paragraph has been revised as follows:

As described in Section 3.8.9, Construction Schedule and Equipment, construction activities would occur primarily during weekdays from 7 a.m. to 5 p.m., except at the San Bruno North and South sites, where construction would start at 8 a.m. and haul trips would finish by 4:30 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

The following text from Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on page 5.7-31 of the Draft EIR, has been revised as follows:

The noise control plan shall contain performance standards based on the more-restrictive of the 60-dBA [A-weighted-decibels]  $L_{eq}$  [equivalent continuous noise level] sleep interference threshold (applicable to nighttime construction), the 70-dBA  $L_{eq}$  speech interference threshold (for daytime construction), and the limits established in noise ordinances of San Mateo County, the Town of Colma, and the cities of San Bruno and Millbrae. The noise control plan shall identify the applicable threshold for each project site.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on page 5.7-32 of the Draft EIR, has been revised as follows:

d) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. ~~to and~~ 5 p.m., except in the City of San Bruno, where such equipment shall be limited to the hours between 9 a.m. and 5 p.m.; and in the City of Millbrae, where such equipment shall be limited to the hours between 8 a.m. and 5 p.m.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, has also been revised on page 5.7-32 of the Draft EIR, as follows:

- f) Erect temporary noise barriers to maintain construction noise levels at or below the performance standards. Barriers shall be constructed with a solid material, with a density of at least 2 pounds per square foot and no gaps. The location, height, and specification of the barriers shall be determined by the approved noise consultant as part of the noise control plan.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls, on page 5.7-32 of the Draft EIR, has also been revised as follows:

- i) For the limited locations where the contractor is unable to mitigate noise through the measures described above (a through h), the contractor shall work with the SFPUC communications liaison and construction management team to provide alternative solutions. The contractor will provide a white noise machine<sup>2</sup> to residents adjacent to the construction work area whose exterior nighttime noise level due to project construction activities exceeds 60 dBA, or exceeds the daytime speech interference threshold of 70 dBA Leq. Exceedances of the dBA criterion shall first be verified by field acoustical measurements. On a case-by-case basis, when the white noise machine does not provide an effective solution and when there are special circumstances such as those home owners with verified special medical conditions or those who work at night and therefore need to sleep during daytime hours, the SFPUC will offer to temporarily relocate them to a nearby hotel. Special medical conditions shall be verified by a doctor.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Page 5.7-34 of the Draft EIR has been revised, as follows:

Even with implementation of Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls...which requires noise control measures and noise barrier walls as part of a Noise Control Plan, construction-related noise levels could still exceed the 70-dBA Leq speech interference threshold by up to 22 dBA. When compared to the average daytime ambient noise levels, the mitigated noise levels would exceed the average ambient levels by up to 30 dB. With such an exceedance, the mitigated construction noise levels would be clearly audible during daytime hours. The appropriate height of noise barrier walls would be evaluated during preparation of the noise control plan. ~~Although noise barrier walls can be employed to mitigate noise at ground floor receptors,~~ However, due to structural, wind, and seismic constraints, it may not be feasible to construct noise barrier walls tall enough to mitigate construction-related noise levels at upper floor receptors. Therefore, the mitigated noise levels would be significant and unavoidable with mitigation.

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<sup>2</sup> A white noise machine is a device that produces a soothing humming or a fan-like sound.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Pages 5.7-34 and 5.7-35 of the Draft EIR have been revised, as follows:

Even with implementation of Mitigation Measure M-NO-1: Prepare and Implement Administrative and Source Controls... which requires noise control measures and noise barrier walls as part of a Noise Control Plan, construction-related noise levels could still exceed the 70-dBA  $L_{eq}$  speech interference threshold by up to 22 dBA. When compared to the average daytime ambient noise levels, the mitigated noise levels would exceed the average ambient levels by up to 33 dB. With such an exceedance, the mitigated construction noise levels would be clearly audible during daytime hours. The appropriate height of noise barrier walls would be evaluated during preparation of the noise control plan. ~~Although noise barrier walls can be employed to mitigate noise at ground floor receptors, However, due to structural, wind, and seismic constraints, it may not be feasible to construct noise barrier walls tall enough to mitigate construction-related noise levels at upper floor receptors. Therefore, the mitigated noise levels would be significant and unavoidable with mitigation.~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-3a: Limit Hours of Construction at Colma Site, on page 5.7-42, has been revised as follows:

This mitigation measure applies to the Colma site. Any construction work conducted within the Town of Colma shall be limited to the hours established in the Town noise ordinance (weekdays 7:00 a.m. to 8 p.m. and ~~Saturdays~~ weekends 10 a.m. to 6 p.m.), unless determined otherwise by the Colma building official.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-3b: Limit Hours of Construction at Millbrae Site, on page 5.7-43 of the Draft EIR, has been revised as follows:

This mitigation measure applies to the Millbrae site. Except for dewatering activities, any construction work conducted within the City of Millbrae shall be limited to the following hours: weekdays 8 a.m. to 6 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m. ~~established in the which is in compliance with the City noise ordinance (weekdays 7:30 a.m. to 7 p.m.; Saturdays 8 a.m. to 6 p.m.; and Sundays and holidays 9 a.m. to 6 p.m.).~~

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 5.7-46 of the Draft EIR, has been revised as follows:

b) The use of vibratory rollers and pile drivers shall be limited to the hours between 7 a.m. and ~~5:40 p.m.~~, except in the City of San Bruno and the City of Millbrae where such equipment shall be limited to the hours between 9 a.m. and 5 p.m. and between 8 a.m. and 5 p.m., respectively.

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting, on page 5.7-46 of the Draft EIR, has been revised as follows:

- f) Weekly reporting of the vibration monitoring results, including distribution of reports to interested parties that have requested them.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* Impact NO-4: Construction activities could result in exposure of persons or structures to generation of excessive groundborne vibration, on page 5.7-48 of the Draft EIR, has been revised under San Bruno South Site to provide the missing mitigation number, as follows:

Implementation of **Mitigation Measure M-NO-4: Develop and Implement Vibration Planning, Monitoring, and Reporting**, which requires vibration control measures and monitoring as part of a Vibration Control Plan, would reduce vibration impacts to *less than significant with mitigation*.

This revision does not change the analysis or conclusions presented in the Draft EIR.

#### 4.1.4.6 Section 5.12, Utilities and Service Systems

In Section 5.12, the first sentence of the first paragraph in Section 5.12.1.1, Utilities, Water Supply, page 5.12-3, has been revised as follows:

By contractual agreement, the SFPUC provides water delivery services via the San Francisco Regional Water System existing Crystal Springs/San Andreas Transmission System to 26 wholesale customers. via in San Mateo County and the San Francisco Peninsula region. Several wholesale customers receive their water through turnouts in the project area off SAPL2, SAPL3, and SSBPL.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-UT-1e: Ensure Prompt Reconnection of Utilities, in Section 5.12.3.5, on page 5.12-13 of the Draft EIR, has been revised to include a new second sentence as follows:

Any utilities inadvertently damaged during construction shall be repaired to pre-project conditions.

This revision does not change the analysis or conclusions presented in the Draft EIR.

#### 4.1.4.7 Section 5.14, Biological Resources

Mitigation Measure M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan, the fourth bullet on page 5.14-48 of the Draft EIR, has been revised as follows:

- To ensure success, vegetation planted as part of the vegetation restoration plan will be monitored for up to 5 years ~~1 year~~ following installation. In addition, monitoring



shall be conducted for 5 years for any tree species planted; except for tree species planted in riparian habitat, for which the monitoring period shall be 10 years.

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* On page 5.14-54 of the Draft EIR, the reference for the Harry Tracy Water Treatment Plant Long-Term Improvements Project EIR, under Adverse Effects on Coast Live Oak Woodland and Riparian Habitat, has been revised as follows:

Oak woodlands extend through the PPSU Millbrae site and HTWTP project site. Impacts from each of these projects to oak woodlands would be minor and in combination would be limited to a small geographic extent (SF Planning, 2010~~2011~~).

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* On page 5.14-59 of the Draft EIR, the reference for the Harry Tracy Water Treatment Plant Long-Term Improvements Project EIR has been revised as follows:

SF Planning (City and County of San Francisco, San Francisco Planning Department), 2010~~2011~~. Harry Tracy Water Treatment Plant Long-Term Improvements Project, Final Draft EIR. SCH No. 2008052106. October~~March~~.

This revision does not change the analysis or conclusions presented in the Draft EIR.

#### **4.1.4.8 Section 5.15, Geology and Soils**

Section 5.15.1.5, Geologic Hazards, Expansive/Corrosive/Collapsible Soils, on page 5.15-17 of the Draft EIR, immediately following the second bullet on the page, has been revised as follows:

Except for corrosivity, ~~t~~The soils data, described below, do not indicate that these types of geologic hazards would occur at the PPSU project sites.

This revision does not change the analysis or conclusions presented in the Draft EIR.

A new paragraph has been added to the Draft EIR on page 5.15-18, after the third paragraph from the top of the page, as follows:

The geotechnical studies completed for the project indicate that portions of the sites are corrosive to ferrous metals and also detrimental to concrete structures (GTC, 2011a, GTC, 2011b, and GTC, 2011c).

This revision does not change the analysis or conclusions presented in the Draft EIR.

Impact GE-5: The proposed project would not be located on expansive soils that could create substantial risks during project operations, on page 5.15-28 of the Draft EIR, has been revised as follows:

Problematic soils, including expansive and corrosive soils, can cause damage to improperly designed structures and facilities, potentially requiring repairs, and/or increasing the need for maintenance. Although clay-rich zones within Franciscan bedrock may be expansive, project-specific geotechnical studies (GTC, 2011b, 2011c, 2011d) have

not identified any substantial hazards associated with shrink-swell potential in native soils at the PPSU sites. The geotechnical studies identified areas of the project sites that are corrosive to ferrous metals and also detrimental to concrete structures. Recommendations from the site-specific geotechnical investigations conducted to support construction activities would reduce potential impacts related to corrosive soils (GTC, 2011a, GTC, 2011c). Measures to be incorporated in the design of the pipelines and appurtenant structures, and which would provide protection from corrosive subsurface conditions, would include, as applicable: consultation with the corrosion engineer for further recommendations regarding backfilling the pipe for issues related to corrosivity of soils and corrosion protection; precautions to avoid damaging the pipe corrosion protection with construction equipment; additional field testing to further evaluate the site, as needed; increased steel thicknesses, increased concrete cover, low water/cementitious materials ratio in concrete, encasement with protective epoxy, and cathodic protection. These requirements would be implemented for the project as described in Section 3.8 of the Project Description (page 3-22). Therefore, the PPSU project would have a *less-than-significant* impact due to expansive or corrosive soils.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

#### 4.1.4.9 Section 5.16, Hydrology and Water Quality

- \* Subsection heading 5.16.3.1, Construction Impacts and Mitigation Measures, on page 5.16-14 of the Draft EIR, has been revised to show the correct subheading number as follows:

##### 5.16.3.1 Construction Impacts and Mitigation Measures

This revision does not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan has been revised with the addition of two new bullets under Erosion and Sedimentation, on page 5.16-16 of the Draft EIR:

- LUP [linear underground/overhead projects] dischargers shall provide effective soil cover for inactive areas and all finished slopes, and utility backfill.
- Install slope breakers at spacing intervals required by the RWQCB.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, has also been revised with additional text added to the last bullet under Permitting, Monitoring, and Reporting on page 5.16-18 of the Draft EIR:

- Immediately notify the RWQCB and other agencies as required (e.g., California Department of Fish and Wildlife, California Emergency Management Agency) of any spill of petroleum products or other organic or earthen materials, and undertake corrective action.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan, on page 5.16-19 of the Draft EIR, has been revised to include the following sentence after the last bullet in the mitigation measure, as follows:

The SWPPP will be provided for review and comment, upon request, to the jurisdictions in which the project is located.

This revision does not change the analysis or conclusions presented in the Draft EIR.

In Section 5.16.3.4 of the Draft EIR, Construction Impacts and Mitigation Measures, on page 5.16-20 of the Draft EIR, has been revised as follows:

Water that is pumped out of the trench or pit would be stored, tested, and treated to meet required standards, then 1) discharged to a nearby sanitary sewer, once the capacity of the system is verified with the appropriate agency; stormwater culvert, creek, or overland; 2) used on site for dust control or for other uses; or 3) discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC would implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. All discharges would be made in such a manner as to not cause erosion, flooding, or other problems. Construction dewatering associated with the project would be temporary and have a short duration.

These revisions do not change the analysis or conclusions presented in the Draft EIR.

- \* Subsection heading 5.16.3.2, Operational Impacts and Mitigation Measures, on page 5.16-23 of the Draft EIR, has been revised to show the correct subheading number as follows:

5.16.3.~~2~~ Operational Impacts and Mitigation Measures

This revision does not change the analysis or conclusions presented in the Draft EIR.

- \* Subsection heading 5.16.3.3, Cumulative Impacts and Mitigation Measures, on page 5.16-23 of the Draft EIR, has been revised to show the correct subheading number as follows:

5.16.3.~~3~~ Cumulative Impacts and Mitigation Measures

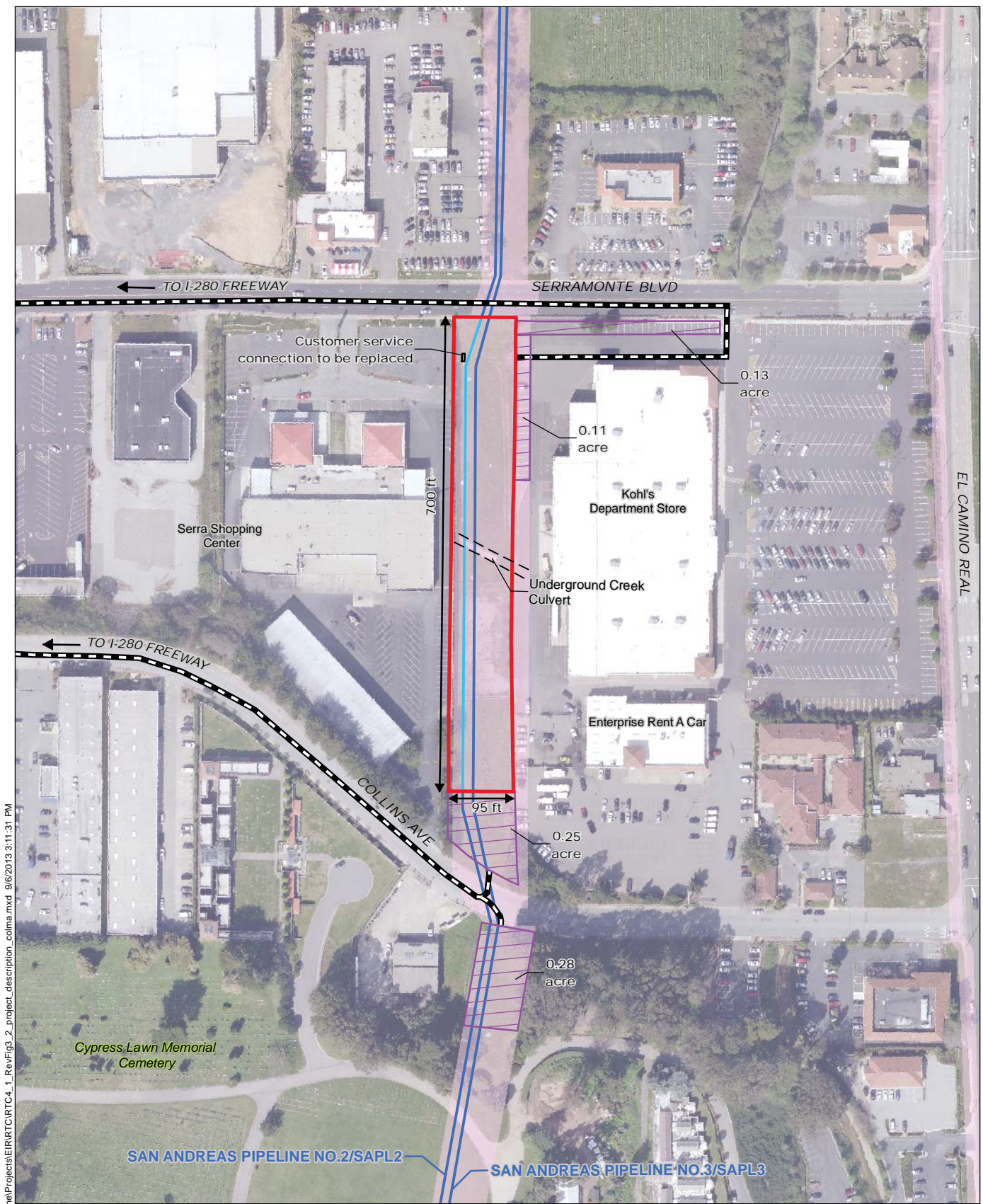
This revision does not change the analysis or conclusions presented in the Draft EIR.

## 4.2 Figure Revisions

Revisions to figures in the Draft EIR have been made in response to comments received. These revisions are listed below and shown on the following pages. These revisions do not change the analysis or conclusions presented in the Draft EIR.

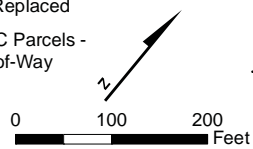
- Figure 3-2, Colma Site, on page 3-4, in Section 3.1, Project Location, has been revised to more accurately show the scale of the wholesale customer service turnout replacement dimensions, as shown in Figure RTC 4-1.

- Figure 3-3, South San Francisco Site, on page 3-5, in Section 3.1, Project Location, has been revised to more accurately show the scale of the wholesale customer service turnout replacement dimensions, as shown in Figure RTC 4-2.
- Figure 3-5, San Bruno South Site, on page 3-8, in Section 3.1, Project Location, has been revised to show the wholesale customer service turnout to be replaced, as shown in Figure RTC 4-3.
- Figure 3-7, Colma Plan and Profile, on page 3-15, in Section 3.5, Proposed Project, has been revised to show the wholesale customer service turnout to be replaced, as shown in Figure RTC 4-4.
- Figure 3-8, South San Francisco Plan and Profile, on page 3-17, in Section 3.5, Proposed Project, has been revised to show the wholesale customer service turnout to be replaced, as shown in Figure RTC 4-5.
- Figure 3-10, San Bruno South Plan and Profile, on page 3-20, in Section 3.5, Proposed Project, has been revised to show the wholesale customer service turnout to be replaced, as shown in Figure RTC 4-6.



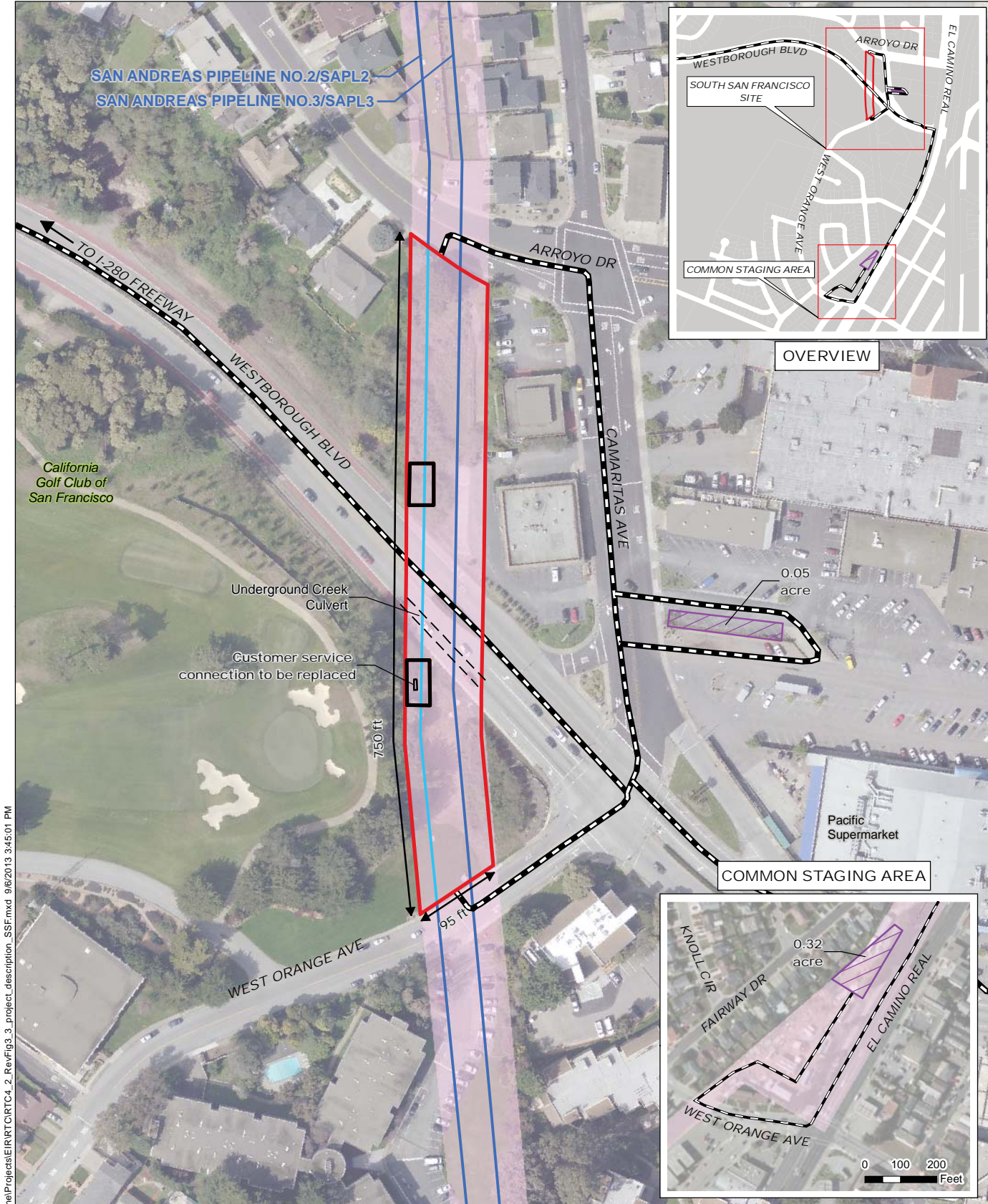
vs:\saved\U\GIS\SFPUC\_Peninsula\_Pipeline\Projects\EIR\RTC4\_1\_Rev\Fig3\_2\_project\_description\_colma.mxd 9/6/2013 3:11:31 PM  
 Source: SFPUC 2011

- Project Components**
- Construction Zone
  - SFPUC Water Transmission Line
  - SFPUC Water Transmission Line to be Replaced
  - Staging and Spoils Area
  - Access Route
  - SFPUC Parcels - Right-of-Way



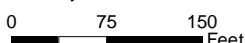
**COLMA SITE**  
 Peninsula Pipelines Seismic Upgrade  
 San Francisco Public Utilities Commission  
 San Mateo County, California

**FIGURE RTC 4-1 (REVISED FIGURE 3-2)**



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- |                           |  |
|---------------------------|--|
| <b>Project Components</b> | SFPUC Water Transmission Line                |
| Construction Zone         | SFPUC Water Transmission Line to be Replaced |
| Staging and Spoils Area   | SFPUC Parcels - Right-of-Way                 |
| Boring Pit                |  |
| Access Route              |  |

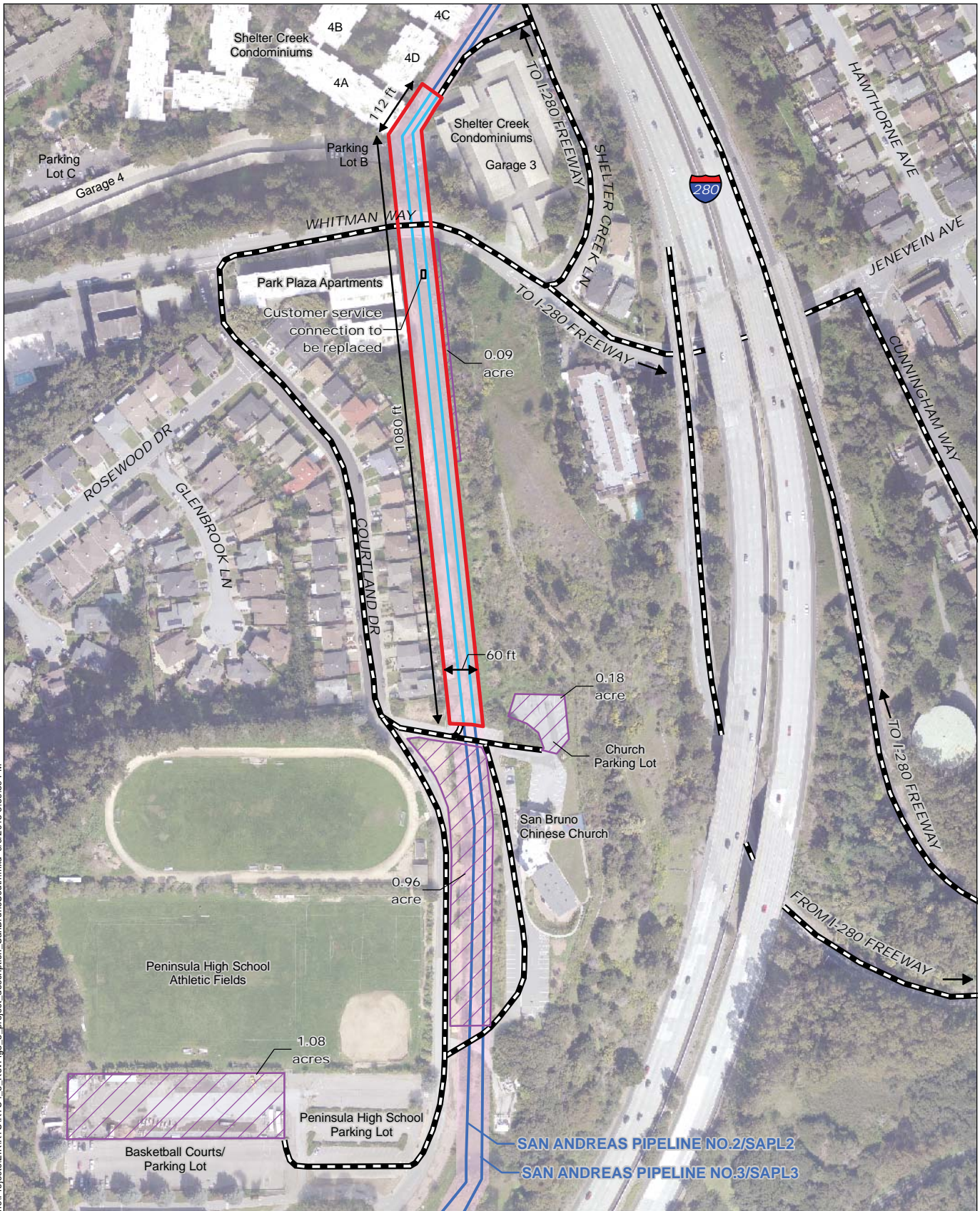


**SOUTH SAN FRANCISCO SITE**

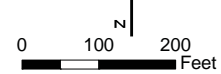
Peninsula Pipelines Seismic Upgrade  
 San Francisco Public Utilities Commission  
 San Mateo County, California

**FIGURE RTC 4-2 (REVISED FIGURE 3-3)**

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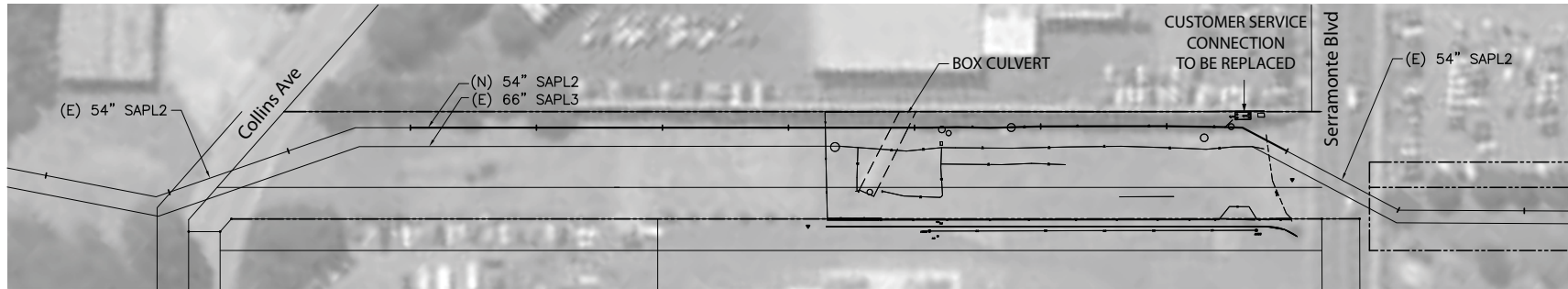
- Project Components**
- Construction Zone
  - Staging and Spoils Area
  - Access Route
  - SFPUC Water Transmission Line
  - SFPUC Water Transmission Line to be Replaced
  - SFPUC Parcels - Right-of-Way



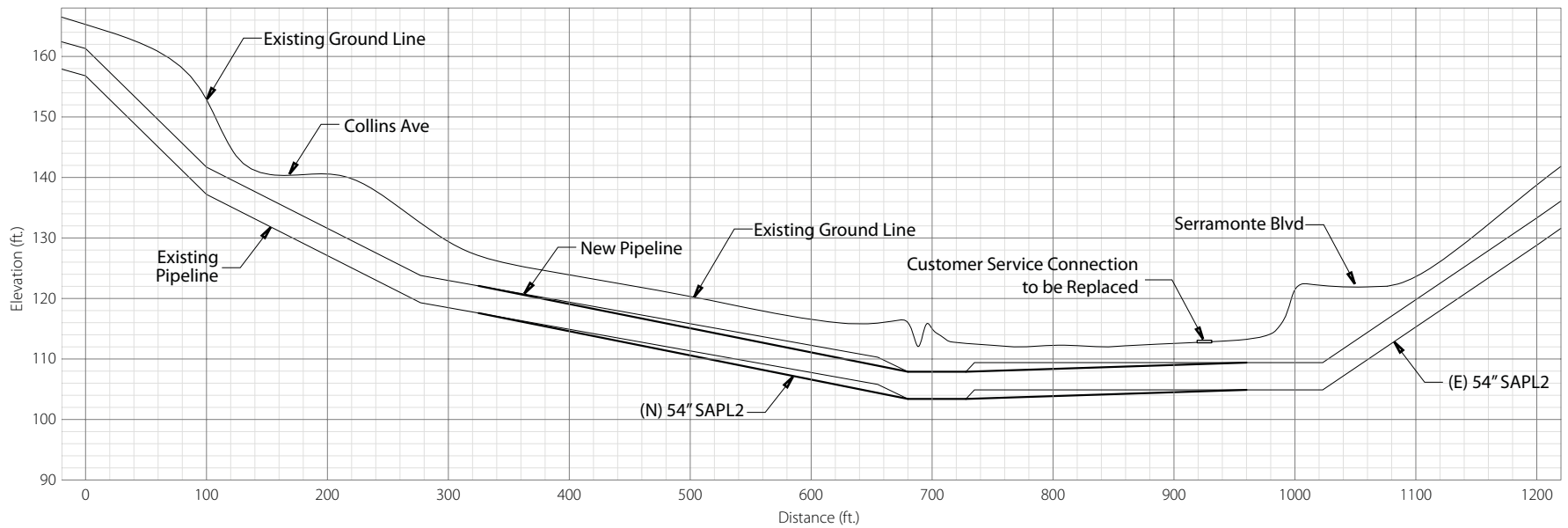
**SAN BRUNO SOUTH SITE**  
 Peninsula Pipelines Seismic Upgrade  
 San Francisco Public Utilities Commission  
 San Mateo County, California

**FIGURE RTC 4-3 (REVISED FIGURE 3-5)**

**Plan and Profile for SAPL2**



Not to scale



Source: G&E Engineering Systems, Inc., September 2011.

Note: Location and dimensions of customer service connection are approximate.

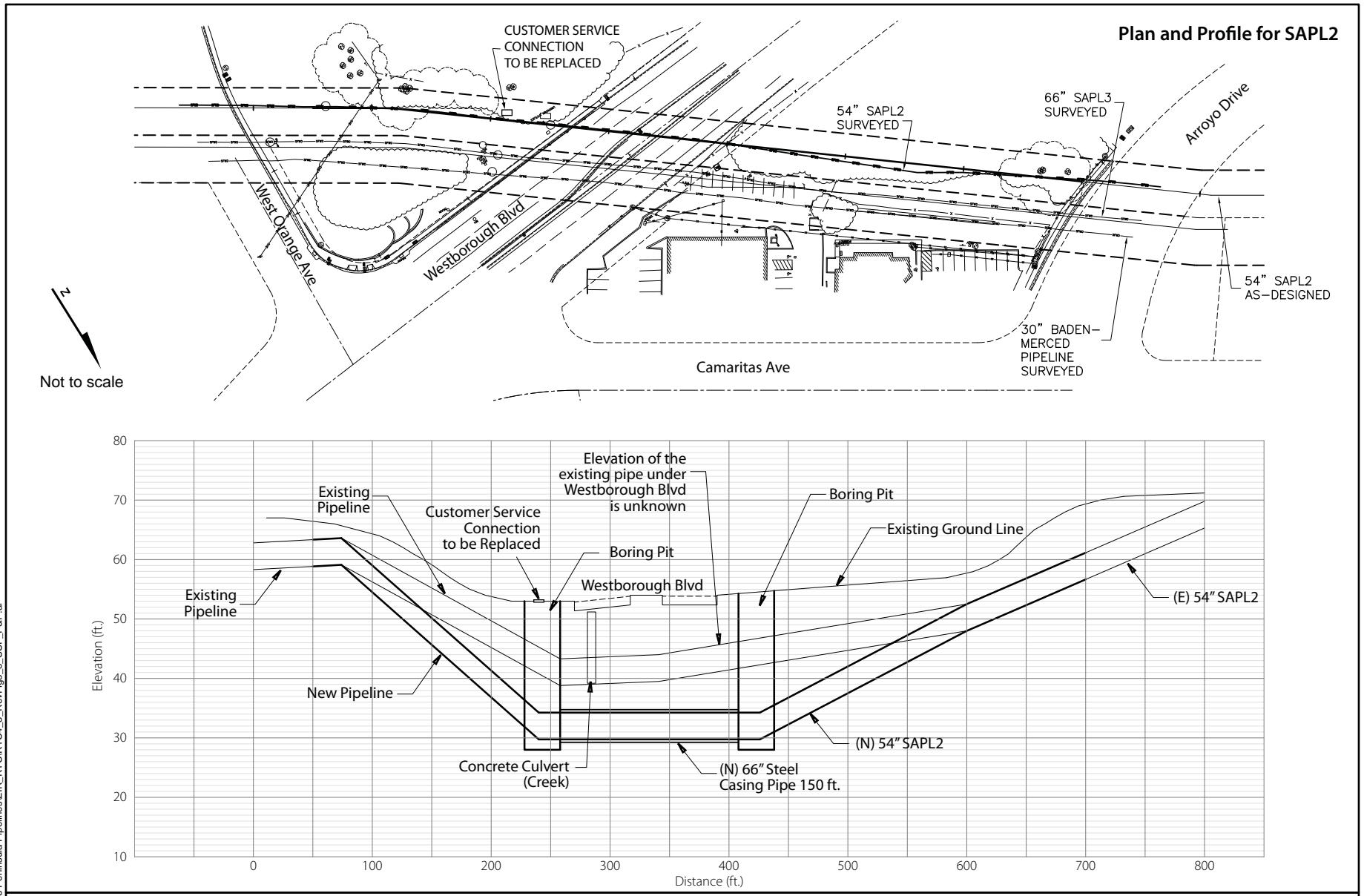
**COLMA PLAN AND PROFILE**

Peninsula Pipelines Seismic Upgrade  
 San Francisco Public Utilities Commission  
 San Mateo County, California

**FIGURE RTC 4-4 (REVISED FIGURE 3-7)**

9/06/13 vsa .T:\SFPUC CS-116 Peninsula Pipelines\EIF\_RTC\RTC4\_4\_RevFig3\_7\_Colma\_P&P.at





Source: G&E Engineering Systems, Inc., September 2011.

Note: Location and dimensions of boring pits and customer service connection are approximate.

(E) — Existing  
(N) — New

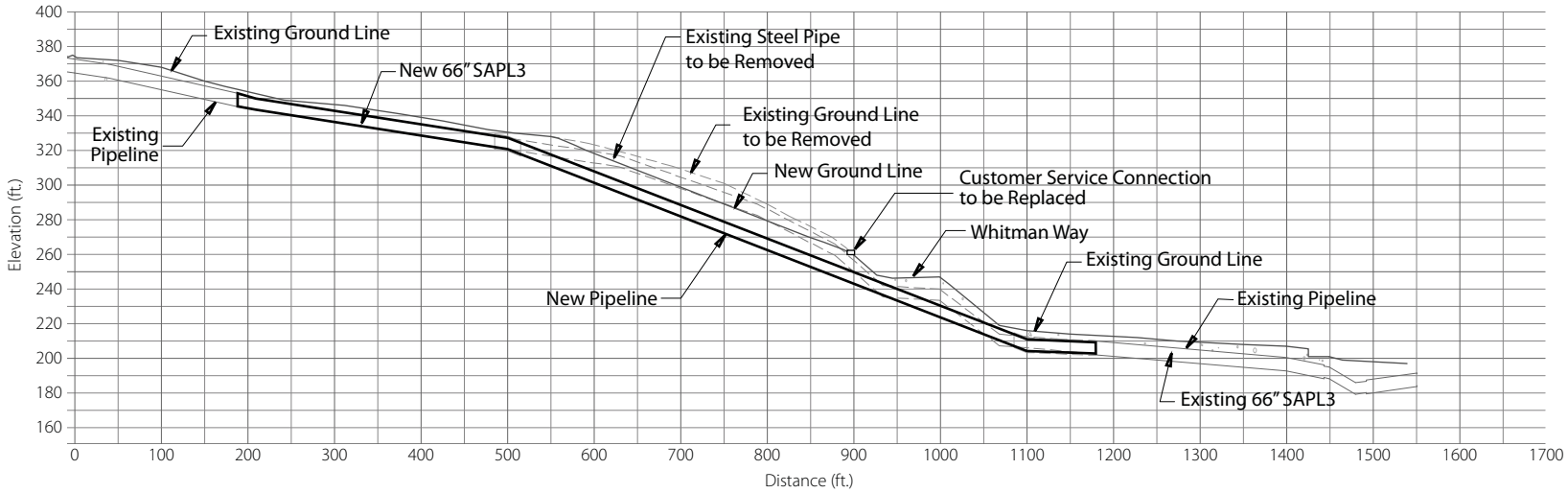
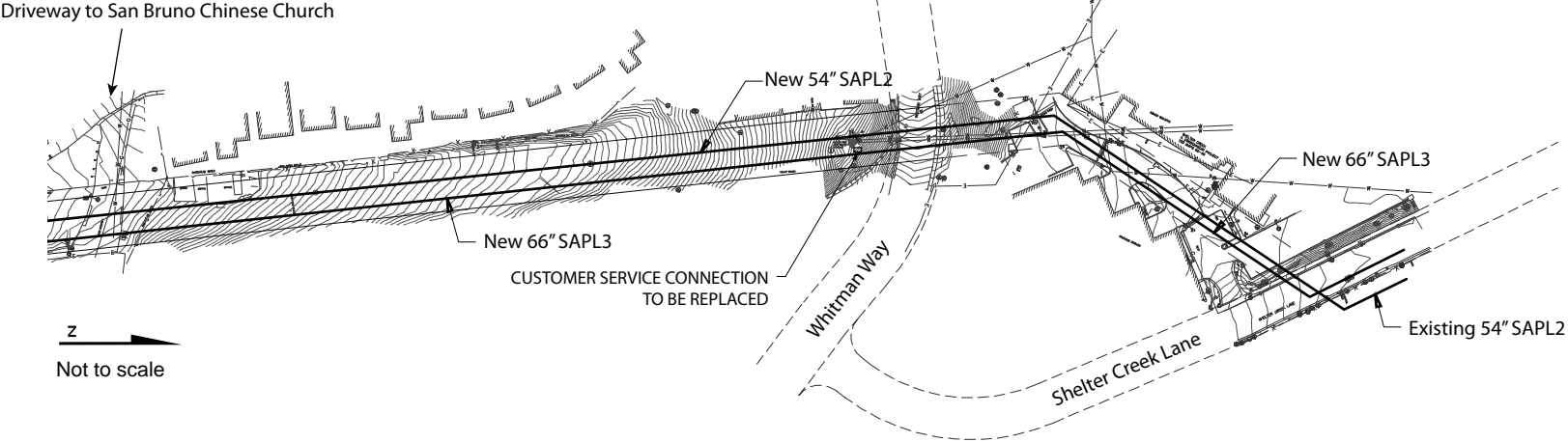
**SOUTH SAN FRANCISCO PLAN AND PROFILE**

Peninsula Pipelines Seismic Upgrade  
San Francisco Public Utilities Commission  
San Mateo County, California

**FIGURE RTC 4-5 (REVISED FIGURE 3-8)**

9/06/13 vsa...T:\SFPUC CS-116 Peninsula Pipelines\ER\_RTC\RTC4\_5\_RevFig3\_8\_SSF\_P&P.ai

**Plan and Profile for SAPL3**



Source: G&E Engineering Systems, Inc., February 2011.  
 Note: The profile shown for SAPL3 is generally representative of the profile for SAPL2.  
 Location and dimensions of customer service connection are approximate.

**SAN BRUNO SOUTH PLAN AND PROFILE**

Peninsula Pipelines Seismic Upgrade  
 San Francisco Public Utilities Commission  
 San Mateo County, California

**FIGURE RTC 4-6 (REVISED FIGURE 3-10)**

9/06/13 vsa ...T:\SFPLUC CS-116 Peninsula Pipelines\ER\_RTC\RTC4\_6\_Rev\Fig3\_10\_SBS\_P&P.ai

# CHAPTER 5

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**ATTACHMENT A**

**DRAFT EIR COMMENT LETTERS AND EMAILS**

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**Table A-1  
Draft EIR Comment Letters/Emails**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.1	Nicole Sandkulla, P.E., Water Resources Planning Manager, Bay Area Water Supply and Conservation Agency (BAWSCA); April 29, 2013	Letter	IN-1	Key facilities of the Regional Water Systems should be described.
			PD-1	Existing wholesale customer turnouts should be identified.
			CU-1	Update cumulative project list.
			UT-1	Provide greater clarity regarding wholesale customer services.
			UT-1	Provide greater clarity regarding wholesale customer services.
A.2	Erik Alm, AICP, District Branch Chief, California Department of Transportation (Caltrans); April 16, 2013	Letter	TR-1	The CCSF is responsible for all mitigation, including improvements to state highways.
			TR-2	CCSF should coordinate with Caltrans prior to submittal of encroachment permit application.
			TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			TR-2	CCSF should coordinate with Caltrans prior to submittal of encroachment permit application.
A.3	Khee Lim, City Engineer, City of Millbrae; April 24, 2013	Letter	PD-2	Limit construction hours.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			BI-1	The approximately 300 trees to be removed at Millbrae in the SFPUC ROW should be replaced.
			PD-4	On-street parking in residential areas should be prohibited.
			UT-2	Any damaged utilities owned by the city should be repaired.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013	Letter	TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			ES-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno.
			ES-2	Public notification should address nighttime lighting during construction.
			ES-3	Lane closure on San Bruno Avenue should not occur during peak hours.
			ES-4	Examine the PPSU project's traffic impacts on Courtland Drive as it extends past the Peninsula High School to Piedmont Avenue.

**Table A-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013 (Continued)		ES-5	Lane closure at Whitman Way will create significant traffic delays.
			ES-6	Traffic Control Plan should be submitted to City of San Bruno and the Town of Colma.
			ES-7	A pre-construction parking survey should be prepared for San Bruno North site.
			ES-8	Restrict construction hours to limit noise impacts to residential neighborhoods.
			ES-9	Nighttime noise levels should be limited and performance standards should be identified as part of coordination with the city.
			ES-8	Restrict construction hours to limit noise impacts to residential neighborhoods.
			ES-10	Removal of any tree in San Bruno requires a tree removal permit.
			PD-5	Describe the work that is required for the rear yard of 1840 Cedarwood Court and how the property owner will be approached.
			PD-6	Describe the fencing and security for the open trenches during construction.
			PD-7	Describe unpermitted structures and process for notification of property owners, as well as slope stabilization and replanting post-construction.
			PD-8	Comments regarding Impact TR-1 also apply to San Bruno Avenue West lane closure.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			PD-9	Before discharging water free of chemicals to storm drains, capacity must be verified.
			PD-10	Lane closure at Whitman Way will create significant traffic delays.
			PD-2	Limit construction hours.
PD-2	Limit construction hours.			
PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.			

**Table A-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.4	Klara A. Fabry, Public Services Director, City of San Bruno; April 29, 2013 (Continued)		PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			PD-11	A third party geotechnical engineer will be required.
			CU-1	Update cumulative project list.
			LU-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno and Town of Colma.
			AE-1	Residents' view of the beautiful Bay from their homes, the San Bruno Chinese Church, and Courtland Drive will be significantly impacted for the duration of the South Bruno South site construction.
			TR-6	The portion of Courtland Drive between north of San Bruno Chinese Church and Madison Avenue is not a City street.
			TR-7	Address intersection LOS discrepancy.
			TR-8	The impact of Walmart.com employees on the I-280 San Bruno Avenue on/off-ramps intersection level of service should be addressed.
			TR-9	Clarify if a staging area would be provided at the San Bruno North site.
			TR-10	A parking survey should be prepared for San Bruno North site and on-street parking should be limited.
			TR-4	Lane closure on San Bruno Avenue should not occur during peak hours.
			TR-5	Lane closure at Whitman Way will create significant traffic delays.
			TR-11	Discuss the non-peak hour impact to the level of service along the haul routes.
TR-12	Discuss impacts of haul trucks to the left turn pocket on San Bruno Avenue to Shelter Creek Lane and the I-280 Crystal Springs Road on/off-ramp.			
TR-13	Describe cumulative impacts related to the Crystal Springs Terrace's New Recreation Building project.			

**Table A-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.5	Michael P. Laughlin, AICP, Town of Colma; April 29, 2013	Letter	GC-1	Agreement with mitigation measures where comments not provided.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			LU-1	Extend public notification boundaries and develop an agreed notification process with City of San Bruno and Town of Colma.
			TR-3	Prepare a Traffic Control Plan in accordance with the traffic control plan requirements of the corresponding jurisdictions.
			TR-14	Project construction may affect holiday traffic along Serramonte Boulevard in Colma.
			GE-1	Assure structural stability of the existing retaining wall
			HY-1	The Town of Colma and sewer districts must approve discharges to the storm drain or sanitary sewer systems.
			PD-12	Provide improved landscaping and maintenance of the SFPUC ROW.
A.6	Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board (RWQCB); April 12, 2013	Letter	GC-2	Comments also apply to the Clean Water Act Section 401 water quality certification.
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			AL-1	Clean Water Act Section 404(b)(1) Guidelines apply to the project.
			AL-2	The LEDPA analysis should consider alternatives to prevent fill in waters of the U.S.
			BI-2	Clean Water Act Section 404(b)(1) Guidelines apply to the project.
			BI-3	The Vegetation Restoration Plan should address mitigation for temporal losses and monitor success of tree species in riparian habitat for 10 years.
			AL-2	The LEDPA analysis should consider alternatives to prevent fill in waters of the U.S.
			BI-3	The Vegetation Restoration Plan should address mitigation for temporal losses and monitor success of tree species in riparian habitat for 10 years.
			HY-2	Dewatering discharges must be approved by the sanitary sewer agency, or other methods employed.
			HY-3	Revise Mitigation Measure M-HY-1 to be consistent with the Construction General Permit requirements.

**Table A-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
A.6	Ben Livsey, Environmental Specialist, San Francisco Bay Regional Water Quality Control Board (RWQCB); April 12, 2013 (Continued)		HY-3	Revise Mitigation Measure M-HY-1 to be consistent with the Construction General Permit requirements.
			HY-4	Dechlorination procedures should incorporate revised standard operating procedures as coordinated with the RWQCB.
B.1	Shelter Creek Condominiums Board of Directors; April 26, 2013	Letter	NO-1	Vibration levels from heavy equipment near buildings.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			NO-3	Construction equipment to be used, access routes to project site, monitoring of vibration. Provide monitoring reports.
			GE-2	Concern about soils at Shelter Creek and pipe materials. Suggestion to extend pipe replacement to driveway.
			GC-3	Concern for warranty of construction work.
			HY-4	Dechlorination procedures should incorporate revised standard operating procedures as coordinated with the RWQCB.
			GE-3	Retaining wall and recycling enclosure within the SFPUC ROW should be assessed by a soil engineer.
			HY-5	Water table levels at Shelter Creek Condominiums and concerns regarding trenching.
			TR-15	Traffic flow into/out of garages at Shelter Creek Condominiums and construction vehicle and resident parking access.
			TR-16	Alternate locations for trash bins at Shelter Creek Condominiums.
			TR-17	Revenue loss from loss of parking spaces during construction.
C.1	Richard Baxter; March 14, 2013	Letter	GC-4	Concern regarding PG&E explosion in San Bruno.

**Table A-1  
Comments on the Draft EIR (Continued)**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
C.2	Henry L. Cash and Lais Henderson-Cash; April 26, 2013	Letter	NO-4	Update distance between 1094 Ridgewood Drive and the proposed construction zone.
			GC-5	Lack of response from SFPUC regarding negative impact on property value.
			NO-5	Sound of water rushing through pipeline can be heard at night. Adverse effects of this noise should be addressed and insulation should be installed on pipe as part of proposed project.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			GC-6	Why is the SFPUC ROW located between two residences instead of in the middle of the street at 1094 Ridgewood Drive?
			PD-13	Provide greater detail regarding the retaining wall proposed along the rear property line of 1094 Ridgewood Drive.
			PD-14	Identify when the trees at Millbrae site will be marked for removal.
			AE-2	Show a photo of the area behind 1094 Ridgewood Drive and a mock-up of what the area would look like after project construction.
			GC-7	How will protocols (mitigation) be enforced for the project?
			GC-8	Keep us on the mailing list for the project.
				NO-4
	NO-5	Sound of water rushing through pipeline can be heard at night. Adverse effects of this noise should be addressed and insulation should be installed on pipe as part of proposed project.		
C.3	Steve Lawrence; March 29, 2013	Email	ES-11	Project objectives need to be clarified.
			ES-11	Project objectives need to be clarified.
			ES-12	Include a new alternative that prepares for and anticipates pipeline failure during a seismic event.

**Table A-1  
Comments on the Draft EIR (Continued)**

<b>Letter Code</b>	<b>Full Name</b>	<b>Comment Type</b>	<b>Topic Code</b>	<b>Topic Title</b>
C.4	Clara R. Taylor; April 16, 2013	Letter	GC-9	Concern with construction trucks trips and impacts on traffic, noise, and air quality.
			TR-18	Construction traffic safety concerns to nearby schools and churches.
			GC-10	Concern about the environment, impact on families, and wildlife.
			AL-3	Should find another route for the project.

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# BAWSCA

Bay Area Water Supply & Conservation Agency

April 29, 2013

Ms. Sarah Jones  
 Acting Environmental Review Officer  
 Peninsula Pipelines Seismic Upgrade Project Draft EIR Comments  
 San Francisco Planning Department  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103-2479

**Subject: Case No. 2011.0123E – Peninsula Pipelines Seismic Upgrade Project  
 Draft Environmental Impact Report  
 State Clearinghouse No. 2011112028**

Dear Ms. Jones,

Thank you for the opportunity to provide the following comments from the Bay Area Water Supply and Conservation Agency (BAWSCA). BAWSCA represents the interests of 25 cities and water districts, an investor-owned utility, and a university, that purchase water wholesale from the San Francisco Regional Water System. These agencies, in turn, provide water to 1.7 million people, businesses and community organizations in Alameda, Santa Clara and San Mateo Counties. BAWSCA member agencies are highly dependent on the SFPUC Regional Water System to provide drinking water critical to the health and safety of consumers in the region.

These comments address the Draft Environmental Impact Report (DEIR) for the Peninsula Pipelines Seismic Upgrade project dated March 13, 2013.

1. **Section 2.2.3 – Regional Water System Facilities (page 2-7)**  
 This general description of the Regional System does not include key facilities constructed as part of the WSIP that are complete or will be operationally functional by the time this EIR is certified. For clarity, the functions of the Tesla Portal UV Disinfection Facility and Alameda Siphon No. 4 should be described. IN-1
  
2. **Section 3.1 – Project Location (Figures 3-2 through 3-6)**  
**Section 3.5 – Proposed Project (Figures 3-7 through 3-11)**  
 The proposed project is identified as impacting three SFPUC water transmission pipelines – SAPL2, SAPL3, and SSBPL – at five locations on the San Francisco Peninsula. Figures 3-2 through 3-6 provide aerial photos of each of the five sites with existing facilities and proposed improvements identified. Figures 3-7 through 3-11 provide plan and profile drawings for the existing facilities and proposed improvements. For each of these figures, it is critical that all of the existing wholesale customer turnouts within the delineated project areas are identified. As currently presented, some customer service connections are identified but not all (e.g. A customer service connection has been called out on Figure 3-2 and noted in the project site narrative but not shown on the corresponding profile figure). Additionally, if a service connection needs to be relocated, it would be helpful to have the PD-1

Ms. Sarah Jones  
April 29, 2013  
Page 2 of 2

customer specifically identified on the location figure if it is a wholesale turnout and also show on the corresponding profile figure.

↑ PD-1  
cont'd.

3. **Table 5.1-1 – Cumulative Project List**

The two SFPUC WSIP projects listed in the table (Regional Groundwater Storage and Recovery, Harry Tracy Water Treatment Plant – Long Term Improvements) should be updated as needed in the Final EIR to reflect any construction schedule changes that may arise from actions to be taken by the SFPUC Commission on the proposed changes to the WSIP (dated March 22, 2013). For example, the proposed construction completion date for the Harry Tracy Water Treatment Plant – Long Term Improvements project is June 30, 2015.

CU-1

4. **Section 5.12.1.1 – Utilities/Water Supply (page 5.12-3)**

The first sentence in the “Water Supply” section should be modified to provide greater clarity. By contractual agreement, the SFPUC provides water supply to 26 wholesale customers via the San Francisco Regional Water System. Several Wholesale Customers receive their water through turnouts located within the project area off SAPL2, SAPL3, and SSBPL. The Wholesale Customers, which includes 24 cities and water districts, plus two private utilities in San Mateo, Santa Clara, and Alameda counties, are represented by the Bay Area Water Supply and Conservation Agency (BAWSCA).

UT-1

5. **Section 5.12.3.4 – Construction Impacts and Mitigation Measures (page 5.12-14)**

Impact UT-2 notes “the PPSU project does not propose to relocate such utilities owned and operated by other utility companies...” while acknowledging relocation may become necessary. Earlier in Section 3.1 the text identified pipe and valves connecting two customer services (one at the Colma site and one at the South San Francisco site) that would be replaced as part of the construction activities. While replacement is not relocation, it would be consistent with the earlier description to acknowledge in this narrative the two instances where water utility customer impacts have been identified.

UT-1

Thank you for the opportunity to provide these comments on the Draft EIR for the Peninsula Pipelines Seismic Upgrade project dated March 13, 2013. If you have any questions, please contact me at (650) 349-3000.

Sincerely,



Nicole M. Sandkulla, P.E.  
Water Resources Planning Manager

cc: J. Labonte, SFPUC  
T. Roberts, Terry Roberts Consulting  
File

**DEPARTMENT OF TRANSPORTATION**

111 GRAND AVENUE  
 P. O. BOX 23660  
 OAKLAND, CA 94623-0660  
 PHONE (510) 286-6053  
 FAX (510) 286-5559  
 TTY 711



*Flex your power!  
 Be energy efficient!*

April 26, 2013

Mr. Steven Smith  
 City and County of San Francisco  
 1650 Mission Street, Suite 400  
 San Francisco, CA 94103

SMVar017  
 SCH# 2011112028

Dear Mr. Smith:

**Peninsula Pipelines Seismic Upgrade Project – Draft Environmental Impact Report**

TR-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental process for the above project. The following comments are based on the Draft Environmental Impact Report (DEIR). As the lead agency, the City and County of San Francisco (C/CSF) is responsible for all project mitigation, including any needed improvements to state highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Required roadway improvements should be completed prior to issuance of the Certificate of Occupancy. Since an encroachment permit is required for work in the state right of way (ROW), and Caltrans will not issue a permit until our concerns are adequately addressed, we strongly recommend that the C/CSF work with Caltrans to ensure that our concerns are resolved during the environmental process, and in any case prior to submittal of a permit application. Further comments will be provided during the encroachment permit process; see the end of this letter for more information regarding encroachment permits.

TR-2

***Transportation Control Plan and Construction Traffic Study***

Since traffic restrictions and detours will be needed on the state highway system, a Traffic Control Plan (TCP) and a construction traffic study discussing impacts to El Camino Real will be required and approved by Caltrans prior to construction. Please prepare the TCP in accordance with the *California Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address:

<http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>

TR-3

The TCP needs to be prepared in accordance with the traffic control plan requirements of the corresponding jurisdictions. For further TCP assistance, please contact the Office Traffic Management Plans at (510) 286-4579.

Mr. Steven Smith/CCSF  
April 26, 2014  
Page 2

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

TR-2

Please feel free to call or email Sandra Finegan at (510) 622-1644 or [sandra\\_finegan@dot.ca.gov](mailto:sandra_finegan@dot.ca.gov) with any questions regarding this letter.

Sincerely,



ERIK ALM, AICP  
District Branch Chief  
Local Development – Intergovernmental Review

c: State Clearinghouse



City of Millbrae
621 Magnolia Avenue, Millbrae, CA 94030

GINA PAPAN
Mayor

NADIA V. HOLOBER
Vice Mayor

WAYNE J. LEE
Councilman

MARGE COLAPIETRO
Councilwoman

ROBERT G. GOTTSCHALK
Councilman

April 24 2013

San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Attention: Ms. Sarah Jones
Acting Environmental Review Officer

Subject: Peninsula Pipelines Seismic Upgrade Report
Case No. 2011.0123E

Dear Ms. Jones:

The City of Millbrae thanks you for the opportunity to review and comment on the Draft Environmental Impact Report for the Peninsula Pipelines Seismic Upgrade Report.

We understand this project once completed will improve the reliability of the regional water system with minimal interruption of water service during and after a seismic event. We support the San Francisco Public Utility Commission's goal to improve the regional water system. However, we have the following comments about the project during the construction phase:

- 1. The project site is adjacent to a quiet residential neighborhood and therefore construction noise is a major concern. We recommend that construction activities be limited to Monday through Friday between the hours of 8:00 AM and 6:00 PM. PD-2
2. The access to the project site will primarily be through an existing easement between 1094 Ridgewood and 1100 Ridgewood, and the City of Millbrae's trail. The City will issue a Hauling Permit and designate a dedicated haul route for construction traffic. A Hauling Permit is required. Additionally, pre-construction conditions of designated haul route shall be surveyed and recorded with the City prior to construction. Once construction is completed the City will survey the post construction haul route pavement conditions and if necessary repair is needed to restore pavement conditions to the pre-construction conditions. This shall also apply to the trail that will be used as access. PD-3
3. The City requires that the approximate 300 trees to be removed as part of the project shall be replaced. These trees will be planted in other locations in the City. BI-1
4. Parking on residential streets will be prohibited during construction. Contractor shall make arrangements to provide parking for its workers at an off site location in order to minimize parking impact to our residents. PD-4

City Council/City Manager/City Clerk
(650) 259-2334

Building Division/Permits
(650) 259-2330

Community Development
(650) 259-2341

Finance
(650) 259-2350

Fire
(650) 259-2400

Police
(650) 259-2300

Public Works/Engineering
(650) 259-2339

Recreation
(650) 259-2360

San Francisco Planning Department  
April 19, 2013  
Page 2

5. Any utilities owned by the City damaged during construction shall be repaired as directed by the City in accordance to City standards. [ UT-2
6. Encroachment permit is required. Additionally, an inspection deposit will also be required and the amount will be determined once the construction phase of the project is more defined. Please direct your contractor to Millbrae Public Works located at 621 Magnolia Ave., Millbrae or (650) 259-2339 for encroachment permit process and associated fees. [ PD-3

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,



Khee Lim  
City Engineer



CITY OF SAN BRUNO

PUBLIC SERVICES – ADMINISTRATION AND ENGINEERING

April 29, 2013

Sarah Jones  
Acting Environmental Review Office  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

San Francisco Public Utilities Commission  
Peninsula Pipeline Seismic Upgrade Project  
Draft Environmental Impact Report (DEIR)

Dear Ms. Jones,

Thank you for the opportunity to review and comment on the DEIR for the San Francisco Public Utilities Commission's Peninsula Pipeline Seismic Upgrade Project. We have reviewed the document and provided the enclosed comments for your consideration and clarifications. Our primary concerns are related to traffic delays and construction noise that will significantly impact our residents and users of the streets during construction.

TR-3

Thank for your consideration of these comments. If you have any questions regarding our comments, please contact Ms. Tina Tseng of my staff at (650) 616-7157 or [ttseng@sanbruno.ca.gov](mailto:ttseng@sanbruno.ca.gov)



Klara A. Fabry  
Public Services Director  
City of San Bruno

Encl.

## Comments for the Draft Environmental Impact Report Peninsula Pipeline Seismic Upgrade Project

Table 1-1

Impact LU-1 (page 1-8)

The construction contractor shall also comply with City of San Bruno's noise regulations pursuant to Section 6.16.070 of the San Bruno Municipal Code.

ES-1

What is the noise impact influence zone? The listed addresses for the San Bruno North and South sites are mostly immediately adjacent to the construction areas. Public notification should be beyond Cedarwood Court and Pepper Drive.

SFPUC shall coordinate with the City of San Bruno to develop an agreed public notification boundaries and process, which includes notification time frames, distribution frequency, interim updates, project website, and etc.

Impact AE-2 (page 1-11)

Will the impacted residents be informed of the potential lighting spillover during night construction? If yes, this should be part of the public notification process to be developed with the City of San Bruno.

ES-2

Impact TR-1 (page 1-23)

San Bruno North Site:

San Bruno Avenue is a major arterial for residents and is near to employee centers. Lane reduction on this high use arterial will create a significant traffic impact during peak and non-peak hours on both local streets and freeway on/off-ramps. The City of San Bruno will not support any lane reduction during peak hours. Any lane closure on San Bruno Avenue shall only occur during non-peak hours between 9 a.m. and 4:30 p.m. At the end of each construction day and before opening the lane for traffic, the access pit shall be steel plated and secured to prevent movement and excess vibration.

ES-3

San Bruno South Site:

Students, faculty members, parents, and recreational users of the field use the access road within the Peninsula High School property. Nearby resident also use this road frequently get to/from Pediment Avenue and Whitman Way. Has a traffic analysis been prepared to exam and evaluate the potential traffic impact during construction?

ES-4

Combination of 236 truck-trips per day (worst scenario) and one-lane control at Whitman Way, the City of San Bruno is extremely concerned that access to the east part of the City will be delayed significantly.

ES-5

Impact TR-3 (page 1-24 & 1-27)

Traffic Control Plan:

Prior to SFPUC's approval of the traffic control plans, the plans shall be submitted to the City of San Bruno for review and comment. The construction contractor shall also obtain an encroachment permit from the City of San Bruno for encroaching San Bruno Avenue and Whitman Way.

ES-6



Specific Site Measures:

Before allowing maximum 10 of construction workers' vehicles to park on residential streets adjacent to the San Bruno North site, a pre-construction parking survey shall be prepared to identify parking demand during the time frames when construction vehicles are expected to park on these residential streets. The City of San Bruno will determine whether to allow construction parking on residential streets base on the parking survey result. ES-7

Impact NO-1 (page 1-34)

Both the San Bruno North and South sites are within residential neighborhoods. The use of vibratory rollers and pile drivers between 7 a.m. and 5 p.m. would significantly impact the adjacent residents. The City of San Bruno has allowed similar use of construction equipment only during the hours between 9 a.m. and 5 p.m. The City will enforce the same requirement and limit the use of vibratory rollers and pile drivers between 9 a.m. and 5 p.m. ES-8

Impact NO-2 (page 1-38)

Noise level during night time construction shall be limited at 60 decibels as measured at 100 feet between the hours of 10 p.m. and 7 a.m. pursuant to Section 6.16.070 of the San Bruno Municipal Code. If this requirement cannot be made, what are the performance standards and plan the construction contractor is required to comply and follow? ES-9

This should also be part of the public notification process to be developed with the City of San Bruno.

Impact NO-4 (page 1-40)

See comments for Impact NO-1. ES-8

Impact BI-4 (page 1-75)

Tree Removal Permit and applicable fee is required from the City of San Bruno to remove any trees within City of San Bruno. This includes any City trees, heritage trees, and private trees. ES-10

Section 3.1.3 San Bruno North Site

It is mentioned that portion of the stabilization work would extend under the rear yard of 1840 Cedarwood Court (page 3-7). How will the SFPUC approach the property owner/resident and what will be required? PD-5

Section 3.8.1.1 Common Construction Elements for Pipeline Replacement

Under the topic of Trench Excavation and Shoring, it is mentioned that open trenches in areas other than public right-of-way will be fenced off (page3-24). Please elaborate the type of security fencing and how it will prevent access to the deep opened trench/pit. The concerned area includes the San Bruno Avenue North site and the steep slope next to the outside staircase at the Park Plaza Apartment building. PD-6

Under topic of Surface Restoration and Revegetation (page 3-25), it is mentioned that unpermitted structures would not be replaced. Have any unpermitted structures been identified at the San Bruno North and South sites? How will the owners of these unpermitted structures be notified and informed? In addition, vegetation that will help to PD-7

stabilize the slope needs to be considered for the slope adjacent to the Park Plaza Apartment. Top soil with normal native plant seed mix would not be sufficient.

↑ PD-7  
cont'd.

Under topic of Access Pits and Tunnel Work at San Bruno North Site (page 3-25), it is mentioned that one of the access pits may be on the sidewalk and into the right-hand lane of eastbound San Bruno Avenue West, which will require lane closure during construction. City's comments for Impact TR-1 will also apply for this section.

PD-8

Section 3.8.4 Pipeline Shutdown and Startup (page 3-28)

Any water planned to be discharged to City of San Bruno's storm drain system, open channels, natural creek, and etc, shall be free of any chemical. Water with treatment chemicals indicated in this section (sodium bisulfite and calcium thiosulfate) shall only be discharged to sewer system, which will require a sewer connection permit from the City.

PD-3

Water free chemical could only be discharged to City of San Bruno's storm drain system after verifying the capacity of the storm system.

PD-9

Section 3.8.5 Dewatering (page 3-30)

Water free chemical could only be discharged to City of San Bruno's storm drain system after verifying the capacity of the storm system. This requirement applies to water discharged during shutdown, hydrotesting, and post disinfection, and dewater of groundwater, rainwater or other water that enters the trenches and pits.

PD-9

Section 3.8.7 Site Access and Construction Vehicle Routes (page 3-32)

Pipeline replacement work at San Bruno South Site will cross Whitman Way. The DEIR mentions that one travel lane will be closed at a time for up to 21 days. City of San Bruno is extremely concerned that access to the east part of the City will be delayed significantly.

PD-10

The City prefers two-way traffic be maintained throughout construction along Whitman Way. At the end of each construction day, the excavated area should be steel plated and secured.

Section 3.8.9 Construction Schedule and Equipment (page 3-36)

Typical construction activities shall be between 8 a.m. and 5 p.m. Monday through Friday. Also, revise the hours shown on pages 5.6-14, 5.6-15, and 5.6-18 accordingly.

PD-2

The use of vibratory rollers and pile drivers shall be limited to the hours between 9 a.m. and 5 p.m. Revise the hours listed in the Impact AE-2 discussion on pages 5.3-23 and 5.7-32.

PD-2

Section 3.10.3 Local (page 3-38)

Under the Various Cities subsection, add grading permit and tree removal permit as City of San Bruno's permitting requirements. Hours of hauling material to and from the City limits are generally between 8 a.m. and 4:30 p.m. Monday through Friday. However, the proposed haul routes include major City arterial and collector streets. Therefore, the **enforced hauling hours will be between 9 a.m. and 4:30 p.m.** Revise the hours shown on pages 5.6-14, 5.6-15, 5.6-18, and 5.6-37 accordingly.

PD-3

A memorandum of agreement between the City and SFPUC will also be required to restore pavement condition along the approved haul routes and to specify limits of roadway

PD-3  
↓

reconstruction on San Bruno Avenue West and Whitman Way. Conditions such as, but not limited to, include surveying the pavement condition before and post construction.

↑ PD-3  
cont'd.

The City will also require SFPUC to provide a third party geotechnical engineer that provides field inspection and oversight on behalf of the City.

PD-11

Section 5.1.3 List of Relevant Projects

Construction status of the following projects shall be reflected on Table 5.1-1 (page 5.1-6)

CU-1

- 599 Cedar Avenue – Construction is currently underway. Two of the 14 single-family homes have not been completed.
- Parkside Intermediate School Classroom Buildings Replacement - Construction completed

Add the following projects:

- Pacific Gas and Electric (PG&E) is proposing to upgrade one of its electric substation located at 635 Pepper Drive, San Bruno, CA, which is near the San Bruno North Site. Confirm project status and construction schedule with PG&E.
- The City of San Bruno is scheduled to begin its slurry seal project in May 2013. Streets included in this project that are near the San Bruno North and South sites are Whitman Way, Masson Avenue, Princeton Drive, San Bruno Avenue West, Bayhill Drive, Kains Avenue, and Acacia Avenue.
- The City also planned to begin its street rehabilitation and reconstruction project in August 2013. Streets included in this project that are near the San Bruno North and South sites are Whitman Way, Markham Avenue, and Park Avenue.
- 1250 Grundy Lane – The San Francisco Police Credit Union project. Project is currently in concept design stage. Construction is tentatively scheduled at the end of 2014.
- New Recreation Building at the Crystal Springs Terrace – Crystal Springs Terrace is located across from the Harry Tracy Water Treatment Plant (HTWTP) on Crystal Springs Road in City of San Bruno. The construction schedule has not been scheduled, but the expected truck traffic route would be similar to the San Bruno South site and the HTWTP project. Traffic impact would be more significant than described if three of these projects all overlap.

Section 5.2.3.4 Construction Impacts and Mitigation Measures

Mitigation Measure M-LU-1a – Notice of Construction Activities:

LU-1

The public notification should be beyond the immediate construction zones. This shall be part of the public notification process to be developed with the City of San Bruno.

Under the Mitigation Measure M-LU-1b – Minimum 2-week Notice of Construction Activities to Homes with Significant Unavoidable Noise Impact:

This shall be part of the public notification process to be developed with the City of San Bruno.

Section 5.3.3.4 Construction Impacts and Mitigation Measures (page 5.3-27)

The DEIR indicates that because "*residents would have obstructed views (rear views, fenced views, and parking lot views)*" that impacts to visual character would be less than significant. The City of San Bruno does not agree that impacts to visual character would be less than significant because of the reasons listed. Residents' view of the beautiful Bay from their homes, the San Bruno Chinese Church, and Courtland Drive will be significantly impacted for the duration of the South Bruno South site construction. The visual character impact is compounded with the noise and traffic impacts the residents will have to endure.

AE-1

Section 5.6.1.2 Local and Site Access and Parking, San Bruno South Site

The DEIR should clearly indicate that portion of Courtland Drive between north of San Bruno Chinese Church and Madison Avenue is not a City street.

TR-6

Section 5.6.3.4 Construction Impacts and Mitigation Measures

- The narrative on page 5.6-18 indicates, "*all intersections would continue to operate at acceptable level (i.e., at LOS D or better)*". However, Table 5.6-9 shows that one intersection within City of San Bruno would degrade from LOS C to LOS E.

TR-7

- Walmart.com moved in the office building at 850 Cherry Avenue in June 2012. Most of the employees use the I-280 San Bruno Avenue on/off-ramps to and from the office. Table 5.6-9 is based on data collected in January 2012 and does not include this large employee occupancy, which may affect the listed intersection level of service.

TR-8

- The narrative on page 5.6-22 indicates a staging area would not be provided at the San Bruno North site. This is not consistent with various discussions and figure in Chapter 3.

TR-9

- City's requirement to prepare a parking survey and limitation of numbers of construction vehicles occupying on-street parking as commented for Impact TR-3 should be included or referenced in this section.

TR-10

- City's lane closure requirements on San Bruno Avenue West as commented for Impact TR-1 should be included in this section. (Any lane closure on San Bruno Avenue shall only occur between 9 a.m. and 4:30 p.m. At the end of each construction day and before opening the lane for traffic, the access pit shall be steel plated and secured to prevent movement and excess vibration.)

TR-4

- City's comments regarding the one-way control traffic operations on Whitman Way should be included in this section. (The City prefers two-way traffic be maintained throughout construction along Whitman Way. At the end of each construction day, the excavated area should be steel plated and secured.)

TR-5

- The DEIR should also discuss the none-peak hours impact to the level of service along the haul routes. The estimated daily construction related traffic is very high and the City anticipates level of service will reduce during non-peak hours.

TR-11

- Assuming truck traffic will enter City limits via I-280 San Bruno Avenue off-ramp, trucks will head west on San Bruno Avenue to Shelter Creek Lane. The left turn

TR-12

pocket on San Bruno Avenue to Shelter Creek Lane is relatively short. The DEIR should discuss the potential impact and mitigation measures for this intersection. The City has similar concerns for trucks entering/exiting I-280 Crystal Springs Road on/off-ramp. The critical two intersections for this route are the signalized and the non-signalized Cunningham Way and Crystal Spring Road.

↑ TR-12  
cont'd.

Section 5.6.3.6 Cumulative Impacts and Mitigation Measures

As commented under Section 5.1.3 List of Relevant Projects, discuss how may the Crystal Springs Terrace's New Recreation Building project may further complicate or increase traffic impact on Crystal Springs Road and the haul route.

↑ TR-13

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TOWN OF COLMA  
PLANNING DEPARTMENT

1190 El Camino Real • Colma, California 94014  
Phone: (650) 757-8888 • FAX: (650) 757-8890

April 29, 2013

Via Email to: [steve.smith@sfgov.org](mailto:steve.smith@sfgov.org)

Ms. Sarah Jones  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

Re: Case No. 2011.0123E - Peninsula Pipeline Seismic Upgrade EIR Comments

Dear Ms. Jones,

Thank you for the opportunity to comment on items discussed in the EIR for the Peninsula Pipeline Seismic Upgrade Project. After reviewing the document, we are in agreement with all the mitigation measures that will be applied to the project, and where we have not commented, we concur with the recommended mitigation measure. [We would like to make the following comments on the document and regarding several of the mitigation measures:

GC-1

PD-3

*Pg. 3-25, Creek Culvert Work at Colma Creek:* The project description mentions the need for possible demolition of a portion of the Colma Creek and reconstruction "in-kind." Any modifications to this structure will require construction plans that must be reviewed and approved by the Town of Colma. In addition, the SFPUC shall be responsible to get any other agency permits (e.g.: state water board, fish and game, etc) if deemed necessary for this work.

*Mitigation Measure M-LU—1a: Notice of Construction Activities.* We appreciate efforts to provide for notification prior to construction. It should be noted that Home Sweet Home is currently unoccupied and may not require notification. There is an apartment complex to the north of the project site owned by the town named Creekside Villas. There are residential units in front of Kohl's to the East. Notification to these individuals should be included.

LU-1

*Mitigation Measure M-TR-3: Traffic Control Plan and M-C-TR: Construction Coordinator.* The Town of Colma Public Works Department welcomes the opportunity to review the Traffic Control Plan when completed and to work with the Construction Coordinator. An encroachment permit will be required for activities or signage in the right-of-way. A pre and post construction pavement condition assessment of existing roadway conditions where trucks will be traveling will be required, and the SFPUC will be required to rehabilitate or pay in-lieu for the pavement damage/deterioration caused by heavy truck traffic

TR-3

As was mentioned in our scoping letter, Colma is a regional shopping destination for automobiles (along Serramonte Boulevard) and other retail establishments. From Thanksgiving weekend through New Year's, traffic increases for holiday shopping – especially on weekends. While

TR-14

Ms. Sarah Jones  
Peninsula Pipeline Seismic Upgrade Project Comments  
April 29, 2013

construction of the project could take place during this timeframe, additional provisions would need to be made to manage the project so as not to impact businesses during this time.

↑ TR-14  
cont'd.

*Impact C-GE Cumulative Impacts to Geology and Soils:* Replacement of the Colma SAPL2 line within the SFPUC right-of-way will require significant excavation to depths of more than 16', in close proximity to an existing retaining wall that supports a car dealership and other improvements above the site. It is not clear if the SFPUC will be submitting grading plans or other plans or reports to the town for review. The EIR does not address measures that will be taken to assure structural stability of this wall. The Final EIR should address this issue. Impact GE-4 states that there is a less than significant impact for the Colma site becoming unstable during project operations. This should be a potentially significant impact with appropriate mitigation. The Town of Colma requires that the SFPUC indemnify the Town for damage created by any aspect of the project.

GE-1

*Mitigation Measure Hy-1: Implementation of a Storm Water Pollution Prevention Plan.* The Town welcomes the opportunity to review and comment on the plan to assure that illicit discharges are not made into any Town storm drain facilities. Town and the sewer districts approval for any discharges to the storm drain or sanitary sewer system are required.

HY-1

*Landscaping and Maintenance:* During the scoping process, we requested a discussion of any plans that the SFPUC has to provide landscaping after the project is completed and the schedule for maintenance. Currently, the easement contains weeds and grass which is mowed periodically. We would like the project to include provisions for improved landscaping and maintenance since the easement bisects our Serramonte commercial corridor.

PD-12

Please feel free to contact me if you have any further questions.

Sincerely,



Michael P. Laughlin, AICP  
City Planner

CC: Greg Bartow



EDMUND G. BROWN JR.  
GOVERNORMATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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**San Francisco Bay Regional Water Quality Control Board**

Date: April 12, 2013  
CIWQS No. 793217 (BL)

Sent via electronic mail: No hard copy to follow

San Francisco Planning Department  
Attn.: Ms. Sarah Jones  
Acting Environmental Review Officer  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479

**Subject: Comments on Draft Environmental Impact Report for the Peninsula Pipelines Seismic Upgrade Project SCH No. 2011.0123E**

Dear Ms. Jones:

San Francisco Bay Regional Water Quality Control Board (Regional Water Board) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Peninsula Pipelines Seismic Upgrade Project (Project). The proposed project involves seismic upgrades to San Francisco Public Utilities Commission (SFPUC) regional water facilities on the San Francisco Peninsula at five sites in the Town of Colma and the cities of South San Francisco, San Bruno, Millbrae, and in unincorporated San Mateo County. Specific project elements include:

- Colma Site – Replacement of an approximately 700-foot pipeline segment
- South San Francisco Site – Replacement of an approximately 720-foot pipeline segment
- San Bruno North Site – Stabilization of pipeline where it extends through a tunnel
- San Bruno South Site – Replacement of an approximately 1,170-foot pipeline segment and a separate 1,050-foot pipeline segment
- Millbrae Site – Replacement of an approximately 900-foot pipeline segment
- Use of a staging area at SFPUC's Baden Valve Lot in South San Francisco

The SFPUC is proposing the project to improve the seismic reliability of transmission pipelines between the Harry Tracy Water Treatment Plant and the Capuchino, Baden, and San Pedro Valve Lots, in the event of a major earthquake on the San Andreas Fault. Based on the information provided in the DEIR we offer the following comments.

Please note that these comments also apply to the submission of Project information in the application for Clean Water Act (CWA) Section 401 water quality certification and should also be addressed therein.

GC-2

Dear Ms. Jones

- 2 -

April 12, 2013

### Comments on Impacts to Biological Resources

The Project described in the DEIR includes impacts to aquatic resources including riparian habitat, streams, and drainages or other waters of the State. Specifically, the Project proposes to: (1) replace segments of a pipeline in waters of the State; and (2) remove vegetation during construction activities. Both a CWA Section 401 water quality certification and a CWA Section 404 Permit from the U.S. Army Corps of Engineers will be necessary for fill impacts to waters of the United States. Additionally, the project proponent may need to file a Report of Waste Discharge if the Project may impact waters of the State, even if such waters have been excluded from federal jurisdiction (e.g., isolated wetlands, ephemeral streams without a significant nexus, or stream banks above the ordinary high-water mark). A Stream Bed Alteration Agreement from the California Department of Fish and Wildlife may also be necessary since the Project involves stream channels and riparian habitat.

PD-3

The Regional Water Board adopted U.S. Environmental Protection Agency's Section 404(b)(1), "Guidelines for Specification of Disposal Sites for Dredge or Fill Material," dated December 24, 1980, in its Basin Plan (Water Quality Control Plan for the San Francisco Bay Region) for determining the circumstance under which filling of wetlands, streams or other waters of the State may be permitted. Section 404(b)(1) Guidelines prohibit all discharges of fill material into regulated waters of the United States, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative (LEDPA) that will achieve the basic project purpose.

AL-1

The Guidelines sequence the order in which proposals should be approached: 1) Avoid - avoid impacts to waters; 2) Minimize - modify project to minimize impacts to waters; and, 3) Mitigate – once impacts have been fully minimized, compensate for unavoidable impacts to waters. When it is not possible to avoid impacts to water bodies, disturbance should be minimized. Mitigation for lost water body acreage and functions through restoration or creation should only be considered after disturbance has been minimized. Where impacts cannot be avoided, the creation of adequate mitigation habitat to compensate for the loss of water body acreage, functions and values must be provided.

The LEDPA analysis should include alternatives with measures or combinations of measures that prevent the placement of fill in waters of the State. This analysis could include, in part, a study on the feasibility of eliminating culverts (where feasible), improving culvert design (i.e., increasing flood conveyance capacity, incorporating natural channel design features such as natural bed and bank, establishing riparian vegetation communities, etc.) when replacing sections of culvert, and replacing the v-ditches with vegetated v-ditches instead of replacing them in-kind. Any improvements to culvert design or elimination of portions of culverts may be considered a gain when calculating mitigation totals.

AL-2

The Regional Water Board considers the following factors in determining the amount and type of mitigation required:

BI-2

- The type of compensatory mitigation (e.g., off-site, out-of-kind);

Dear Ms. Jones

- 3 -

April 12, 2013

- Differences between the aquatic resource functions lost at the impact site and the functions expected to be provided by the mitigation project;
- Temporal losses of aquatic resource functions (i.e., functions lost due to the passage of time between loss of the impacted aquatic resource and creation/restoration of the full-functioning mitigation project); and
- The difficulty, uncertainty, and likelihood of success of a mitigation project.

↑ **BI-2**  
**cont'd.**

The DEIR discusses the removal and replacement of riparian vegetation. This is considered a temporal impact that may require compensatory mitigation. The Revegetation Restoration Plan (Mitigation Measure M-BI-1c: Prepare and Implement a Vegetation Restoration Plan) should address mitigation for any temporal loss in riparian habitat function.

↑ **BI-3**

While the DEIR includes an in-depth discussion of alternatives in Chapter 7, the LEDPA analysis that will eventually be submitted for the 401 water quality certification application will need to address the comments discussed above. CEQA can play a role in accomplishing the goals and requirements of the Regional Water Boards' Basin Plans. However, the alternatives analysis required by CEQA is not analogous to the alternatives analysis required by the Regional Water Board. CEQA and the Porter-Cologne Water Quality Control Act (Cal. Water Quality Control, Division 7) are different acts with different requirements and procedures. Therefore, the Regional Water Boards use their discretion when evaluating a CEQA alternatives analysis and may require additional analysis and information to satisfy the requirements of the Porter-Cologne Water Quality Control Act and the Basin Plan.

↑ **AL-2**

#### *M-BI-2b: Supplemental Measures for the Vegetation Restoration Plan*

Mitigation Measure M-BI-2b states that, "to ensure success, vegetation planted as part of the vegetation restoration plan will be monitored for 1 year following installation. In addition, monitoring shall be conducted for 5 years for any tree species planted (p. 5.14-48)." Given the uncertainty associated with restoration, Regional Water Board staff recommends minimal monitoring periods of 5 years for the herbaceous and shrub species in wetlands and riparian habitat and 10 years for tree species in riparian habitat. The additional monitoring period for tree species is because the root systems of tree species generally take longer to develop than herbaceous and shrub species and are more susceptible to impacts associated with weeds, herbivory (deer and rodent damage), and drought during the establishment period.

↑ **BI-3**

### **Comments on Impacts to Hydrology and Water Quality**

#### *Dewatering Effluent*

The DEIR states that, "dewatering may be required for groundwater, rainwater, or other water that enters the trenches and pits. Water that is pumped out of the trench or pit would be stored, tested, and treated to meet required standards, then discharged to a nearby sanitary sewer, stormwater culvert, creek, or overland (p. 5.16-20)." For any site dewatering activity, whether or not there is known soil contamination at the site, dewatering discharges may be contaminated. As a first choice, water should be

↑ **HY-2**  
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Dear Ms. Jones

- 4 -

April 12, 2013

discharged to the sanitary sewer, assuming approval can be obtained from the sanitary sewer agency. If approval to discharge to the sanitary sewer cannot be obtained then the water should be used onsite for dust control or for other uses. If the water is not needed for onsite use, then the water should be discharged to a vegetated upland. If the water is tested and found to be clean, and if there is no history of contamination on the site or on adjacent sites, the SFPUC should implement a sediment removal program as necessary to ensure that the water is clean prior to discharge to a storm drain or water body. In addition, the SFPUC should confirm that the discharge will not cause erosion, flooding or other problems. Section 5.16 Hydrology and Water Quality should be revised to reflect the Regional Water Board preference hierarchy for dewatering discharges.

↑  
HY-2  
cont'd.

*Consistency with Construction General Permit*

The Project will be covered under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity, State Water Resources Control Board Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ (Construction General Permit). The DEIR Mitigation Measure M-HY-1: Preparation and Implementation of a Storm Water Pollution Prevention Plan should be revised to be consistent with the requirements of the Construction General Permit.

↑  
HY-3

Mitigation Measure M-HY-1 discusses erosion and sedimentation BMPs including, “stabilize and revegetate disturbed areas as soon as possible after construction by planting or seeding and/or using mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material) (p. 5.16-16).” Mitigation Measure M-HY-1 should be revised to be consistent with the Construction General Permit requirement: “LUP [linear underground/overhead projects] dischargers shall provide effective soil cover for inactive<sup>1</sup> areas and all finished slopes, and utility backfill.”

Also, Mitigation Measure M-HY-1 should be revised to be consistent with the Construction General Permit requirement for the installation of temporary slope breaks. The Construction General Permit requires all linear underground/overhead projects type 2 and 3 and traditional construction projects with risk level 2 and 3 to apply linear sediment controls along the tow of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with the sheet flow lengths shown in Table 1 (regardless of proximity to a water body, wetland, or road crossing).

Table 1: Critical Slope/Sheet Flow Length Combinations in Construction General Permit

Slope percentage	Sheet flow length not to exceed
0-25%	20 feet
25-50%	15 feet
Over 50%	10 feet

<sup>1</sup> Areas of construction activity that have been disturbed and are not scheduled to be re-disturbed for at least 14 days.

Dear Ms. Jones

- 5 -

April 12, 2013

Accordingly, the DEIR Mitigation Measure M-HY-1 should include slope breaks as a BMP (e.g., “install slope breakers at spacing intervals required by the RWQCB”).

↑ **HY-3**  
cont'd.

### *Emergency Notification Procedures*

The DEIR discusses emergency notification procedures, “immediately notify the RWQCB and other agencies as required (e.g., California Department of Fish and Wildlife) of any spill of petroleum products or other organic or earthen materials, and undertake corrective action (p. 5.16-18).” We remind the SFPUC that Health and Safety Code<sup>2</sup> requires notification to the California Emergency Management Agency (CalEMA) of any release of a hazardous material<sup>3</sup> into the environment. The DEIR should discuss notification to CalEMA as a mitigation measure for any spill of hazardous material.

↑ **HY-3**

### *Planned Pipeline Discharges*

The DEIR states that:

During pipeline shutdown, water would be drained from sections of the pipelines and would be discharged to the nearest storm drain system, open channel, natural creek, or overland in accordance with the San Francisco RWQCB Waste Discharge Requirements of Order No. R2-2008-0102 (RWQCB, 2008), which stipulates requirements related to discharges of water from the SFPUC’s water transmission system, including dechlorination requirements, flow rates, effluent limitations, and monitoring (p. 5.16-21).

↑ **HY-4**

We remind the SFPUC that, as a result of recent dechlorination problems on San Mateo Creek and resulting fish kills, the Regional Water Board has been coordinating with the SFPUC on revising the standard operating procedures for dechlorination during planned discharges from the drinking water transmission system pipeline. Lessons learned from recent planned and unplanned discharge events on San Mateo Creek should be incorporated into the dechlorination procedures for the Project.<sup>4</sup>

<sup>2</sup> California Health and Safety Code Title 19, Div. 2, Chapter 4, Section 2703: “A person shall provide an immediate, verbal report of any release or threatened release of a hazardous material to the administering agency and the California Emergency Management Agency as soon as: (1) a person has knowledge of the release or threatened release; (2) notification can be provided without impeding immediate control of the release or threatened release; (3) notification can be provided without impeding immediate emergency medical measures.”

<sup>3</sup> The Porter-Cologne Water Quality Control Act defines a “hazardous substance” for discharge to surface waters, any substance determined to be a hazardous substance pursuant to Section 311(b)(2) of the Federal Water Pollution Control Act (33 U.S.C. Sec. 1251 et seq.).

<sup>4</sup> For further information on Regional Water Board requirements related to Waste Discharge Requirements for the San Francisco Public Utilities Commission Drinking Water Transmission System (NPDES Permit for WISP Order No. R2-2008-0102, NPDES No. CA0038857) contact Vince Christian ([Vince.Christian@waterboards.ca.gov](mailto:Vince.Christian@waterboards.ca.gov); 510-622-2336).

Dear Ms. Jones

- 6 -

April 12, 2013

**Closing**

Please contact me at 510-622-2308 or [blivsey@waterboards.ca.gov](mailto:blivsey@waterboards.ca.gov) with any questions or comments.

Sincerely,



Ben Livsey  
Environmental Specialist

cc: State Clearinghouse, [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)  
SWRCB, DWQ, [Stateboard401@waterboards.ca.gov](mailto:Stateboard401@waterboards.ca.gov)  
USACE, Greg Brown, [gregory.g.brown@usace.army.mil](mailto:gregory.g.brown@usace.army.mil)  
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YinLan Zhang, [YZhang@sfgwater.org](mailto:YZhang@sfgwater.org)

April 26, 2013

**SF PUC Pipeline Construction Concerns:**

**Noise and Vibration**

The noise issue is addressed in the DEIR with the threshold to be at 70 decibels, are the vibration levels from the use of the heavy equipment discussed? That is one of the most critical issues since the trenching will be down to 30 feet in depth. Since there will be two separate trenches, dug at two different times and coming as close as 15 feet to building 4 at one point. Screens may not help. They are good for the dust but uncertain that they will be that effective for the noise for the sustained time of the digging these large trenches. Some contingency needs to be made in case relocation of the residents becomes necessary.

NO-1  
NO-2

Exactly what equipment will be used and how will it enter and exit the property for the digging. We understand that survey monitoring devices will be installed on the building during the slip plating and excavation. The Association would like copies of these daily monitoring reports.

NO-3

**Soil Test & Water Levels**

We did not to see anything about soil testing. Shelter Creek has areas that react with metal. We understand that the replacement pipes are to be stainless steel with a concrete jacket, but what about the part of the old pipes where the joining will be. Is it possible that the length of the two new sections could be extended to at least driveway 3 , in case of any further problems. We also understand that we are to be "covered" for two years, but after all the problems historically on property with San Bruno water pipe mains and what was found with the storm drain system, it would be nice to err on the side of caution.

GE-2  
GC-3

Also the level of the water table on the property in some places is very close to the surface especially in winter. SC was built on a swamp like area. In winter, the water table actually comes so near the surface under Garage 5, that water has been known to seep up through any cracks in the concrete floor. I understand that a well has been dug near the recycling enclosure. Do we know the what it shows considering the trenches are going down to about 30 ft..

HY-4

**Recycling enclosure and Retaining Wall**

It appears that the recycling enclosure is built on the right-of-way. The part of the retaining wall that is located on the right-of-way is problematic. I understand that a soil engineer will probably have to be called in to assess the situation. This issue will have to be followed up on. Water run-off following the removal of the retaining wall is a concern. A catch basin or storm drain system should be considered. There is also concern about hillside erosion following the removal of the natural vegetation.

GE-3  
HY-5

**Traffic and Garbage Removal**

It is mentioned that between the working hours of 7 am to 5 pm, there will be traffic control personnel on site to help to help with the flow of traffic on the Whitman Way driveway/Fire Lane to facilitate access to the lower level of G4, and Lots C & B. Is any of the road area going to be used to bring in any of the construction equipment? We were planning to resurface these areas this year. What will the effect be if we do so? [Trash staging area for pick up by San Bruno Recology (three times a week) runs along the construction zone, and is the pick-up area for 10, half yard trash bins. Where can this staging area be relocated for pick up? This includes the trash room access area of the south end of building 4 in the construction zone. The access to this room will be severely restricted. The construction area on Driveway 3 is also a main collection point for the bins for Buildings 3, 4 and 5. We will need to come up with an alternate route and site. There is no alternative, though, for this one garbage room at building 4.

TR-15

TR-16

**Rental parking spaces Lot B**

The Association rents parking spaces to residents in lot B adjacent to either side of the recycling enclosure. The revenue loss is \$7,200 per year and those renters will be displaced for the duration of the project.

TR-17

**Irrigation & Landscaping**

Landscaping and irrigation lines will be removed by SF PUC during the project. Who will be responsible for safely removing and re-establishing irrigation and electrical lines during and after the project completion? If the irrigation lines are capped off, who will be responsible for providing water to the interrupted outlying landscaping areas not directly in the project area.

UT-3

**Emergency Contingency**

What is the emergency plan for a sudden discharge of water from either pipe during the construction of the opposing pipe (from vibration or shock) Will the water be shut-off to both pipes during construction?

UT-4

Sincerely,  
Shelter Creek Board of Directors



RECEIVED

MAR 15 2013

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

PLANNING DEPARTMENT  
CITY & COUNTY OF  
SAN FRANCISCO

3/14/13

SARAH JONES / STEVEN SMITH,

I AM VERY MUCH INTERESTED IN INFORMATION CONCERNING THE SAN BRUNO PIPE EXPLOSION OF SEPTEMBER 9, 2010. THE EXPLOSION OCCURRED SEVERAL BLOCKS NEAR MY CONDOMINIUM, SHELTER CREEK CONDOMINIUM COMPLEX, AND AS A CONCERNED CITIZEN I AM SEEKING INFORMATION AS TO WHAT

GC-4

REALLY HAPPENED THAT EARLY EVENING  
OF SEPT. 9, 2010. THERE WAS A  
BLACK-OUT IN MY CONDOMINIUM COM-  
PLEX THROUGHOUT THE NIGHT AND  
TRAFFIC WAS BLOCKED LEADING TO  
THE COMPLEX, SAN BRITO WEST.

WOULD YOU PLEASE MAIL ME  
THE INFORMATION REQUESTED.

SINCERELY,  
RICHARD BAXTER

GC-4  
cont'd.

1209 SHELTER CREEK LN.  
SAN BRUNO, CA 94066



THE PLANNING DEPARTMENT  
CITY AND COUNTY OF SAN FRANCISCO  
1650 MISSION STREET  
SAN FRANCISCO, CA 94103  
c/o SARAH JONES / STEVEN SMITH

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE  
**CERTIFIED MAIL™**



7012 2210 0000 1779 3837

RETURN RECEIPT  
REQUESTED

54167241

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**RECEIVED**

APR 29 2013

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M E A

April 26, 2013

Henry L. Cash  
Lais Henderson-Cash  
1094 Ridgewood Drive  
Millbrae, CA 94030-1025

Sarah Jones  
Acting Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

RE: Draft Environmental Impact Report  
Case No. 2011.0123E  
Project Title: Peninsula Pipeline Seismic Upgrade Project  
Millbrae site: Residences/ Sunset Supply Pipeline

Dear Ms. Jones:

We appreciate this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Peninsula Pipeline seismic Upgrade Project at the Millbrae site. At this time, we are submitting our comments and concerns about the proposed project.

The Draft EIR incorrectly states that 1094 Ridgewood is 10' from the proposed construction zone. Please note that the pipeline replacement project will occur within 13' of our home at 1094 Ridgewood in Millbrae, CA. The front property width is 80'; and on the southern boundary there is a 7' public service easement, our house covers an additional 40' and on the northern boundary there is the 20' San Francisco Public Utilities Commission easement for a sum total of 67'. See The Exchange Deed dated November 4, 1955, and recorded December 6, 1955, in Book 2929 of the official records of San Mateo County at page 244 (10198-N).

NO-4

The DEIR has failed to address our specific real estate property questions and concerns that we submitted to the department on December 5, 2011, regarding the proposed project the negative impact on our property value, required property-disclosure,

GC-5

indemnification, property restoration, and insurance liability issues. We were advised that someone in the Real Estate Services Department (RES) would contact us regarding these matters; to date no one in the RES department has contacted us. We sincerely hope that this lack of follow-up by the RES is not an indicator of what is to come with this project.

↑ GC-5  
cont'd.

The SSBPL pipeline located in our north yard is directly adjacent to two of our bedrooms, and at night, one can hear the massive amounts of water rushing through the pipe and the changes in intensity when opening valves at different times throughout the night/week; and to our knowledge, the SFPUC has not monitored the noise levels from the water main nor include insulating this pipeline in its up-graded seismic project plans. Even though there is sufficient evidence from large-scale epidemiological studies linking the population's exposure to environmental noise with adverse health effects.<sup>i</sup> The World Health Organization's guidelines recommend that a nighttime average level of noise suitable for undisturbed sleep of from 35 to 30 dB. Therefore, this environmental noise should be considered as a concern for public health and environmental health.

↑ NO-5

The fact that the proposed project comes with unavoidable impacts on the adjacent property owners is one issue. The residents at 1094 and 1100 Ridgewood are all retired individuals and we spend a great deal of our time at home, to suggest that we should close our windows and or change our schedules is not applicable. The second issue is how the SFPUC is going to mitigate the unavoidable impacts. We suggest that SFPUC mitigate this abysmal situation by providing us with temporary housing within the city of Millbrae. So that we are not listening to deafening construction noises for 8 to 12 hours per day and up to 7 days per week for up to 4.5 months. This solution would also reduce/eliminate the exacerbation of the resident's medical conditions.

↑ NO-2

The SFPUC had the opportunity to acquire the 132 by 50 feet of land when it installed the Sunset Supply Branch Pipeline, fence it off or leave it as adjacent open space to Millbrae's Spur Property (aka the staging ground). Ridgewood Drive at Banbury Lane is a dead end street and Banbury is only a block long. It was not necessary or the logical

↑ GC-6  
↓

choice for SFPUC to encumber these two residences (1094 & 1100 Ridgewood Drive). It is our understanding that most of the SFPUC Right of Way are located in the center of the public streets, and are owned by the City and County of San Francisco in fee, and then the questions becomes why all the inconsistency at this location.

GC-6  
cont'd.

The DEIR does not provide adequate information about the retaining wall that is being proposed. We have several questions regarding this retaining wall's design and construction. The DERI states that the retaining wall is to be permanent wall with 10' footings without stating the varying dimensions of each footing. Will the proposed retaining wall confirm to Millbrae's building code. What are the length, width, and height of the retaining wall if measured from the grade at the face of the wall to its top? During the wall's construction will the excavation site be back-filled, compacted, and reinforced. What type of drainage system will be installed within? In addition, will the retaining wall's drainage system connect to the existing City of Millbrae's concrete v-ditch channel? Who is responsible for maintaining the retaining wall after it is installed by the SFPUC. What is the proposed installation date for installing the retaining wall?

PD-13

The DEIR fails to address when the approximately 300 trees identified for removal will be marked with paint and or numbered prior to removal, as per the Integrated Vegetation Management Policy section 13.002 - 2.0.

PD-14

The DEIR is inadequate and incomplete in that it does not include a single photo of the area where the pipeline turns sharply and makes a substantial drop in elevation. (In a major earthquake this location is most apt to fail.) Although the DEIR does provides a number of photographic views of the project site from various other locations. In addition, the DEIR evades showing a mock-up or artist rendition of what the project might look like afterward.

AE-2

We are also concerned about application of the protocols enumerated in the DEIR. From our experience from 49 years of involvement in construction and project maintenance, that issues like idling trucks and machinery, daily debris clean up, security, and some time safety issues are not addressed until a problem arises. For

GC-7

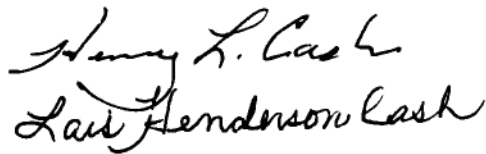
example, a delivery truck pull-up and blocks someone's driveway because the driver is only going to be there a for minute, and or a supervisor drives up does the same thing one minute turns into several and now the neighbors are up in arms because this scene is repeated multiple time in a day. Not many people employed in the construction industry stop what they are doing to walk over to the trash/recycle container and properly dispose of their sawdust, bent nails, broken bits, cans, and skew number tags etc.

↑ GC-7  
cont'd.

Lastly, we realize that this is a draft ERI and not the final EIR report, but it would be comforting to know that all of these issues are being addressed concurrently. We ask that you keep us on the distribution mailing list and continue to keep updated regarding any developments in the Peninsula Pipeline Seismic Upgrade Project.

↑ GC-8

Thank You,



Henry L. Cash

Lais Henderson-Cash

Enc. 2

---

<sup>11</sup> Hume KI, Brink M, Basner M. Effects of environmental noise on sleep. *Noise Health* 2012;14:297-302



YO 1056.1-34 (1-70)  
 American Land Title Association Loan Policy-1970  
 With Street Improvement Assessment Coverage

NO-4

## SCHEDULE B

### PART I

This policy does not insure against loss or damage by reason of the following:

1. TAXES FOR THE FISCAL YEAR 1970-71, A LIEN, NOT YET DUE OR PAYABLE INCLUDING PERSONAL PROPERTY TAXES, IF ANY, AMOUNT NOT ASCERTAINABLE.
2. EASEMENT FOR LINE OF POLES AND WIRES AND APPLIANCES ETC., AS GRANTED BY THE STONESON DEVELOPMENT CORPORATION, TO PACIFIC GAS AND ELECTRIC COMPANY, BY GRANT DATED OCTOBER 7, 1955 AND RECORDED OCTOBER 26, 1955 IN BOOK 2901 OF OFFICIAL RECORDS OF SAN MATEO COUNTY AT PAGE 663 (97666-M), AND AS SHOWN ON THE MAP MENTIONED HEREIN.
3. RIGHT OF WAY EASEMENT FOR THE INSTALLATION, OPERATION, MAINTENANCE, ETC., TOGETHER WITH THE RIGHT TO CHANGE THE NUMBER AND SIZE OF PIPES AND PIPE LINES, ETC., AS GRANTED BY THE STONESON DEVELOPMENT CORPORATION, A CORPORATION TO THE CITY AND COUNTY OF SAN FRANCISCO, A MUNICIPAL CORPORATION IN THE EXCHANGE DEED DATED NOVEMBER 4, 1955 AND RECORDED DECEMBER 6, 1955 IN BOOK 2929 OF OFFICIAL RECORDS OF SAN MATEO COUNTY AT PAGE 244 (10198-N) AND AS SHOWN ON THE MAP MENTIONED HEREIN.  
 AFFECTS A STRIP OF LAND 20 FEET WIDE ALONG THE NORTHERLY BOUNDARY LINE OF LOT 20, BLOCK 30.
4. PUBLIC SERVICE EASEMENT OVER THE HEREIN DESCRIBED PROPERTY, TO BE KEPT OPEN AND FREE FROM BUILDINGS AND STRUCTURES OF ANY KIND, AS SHOWN ON THE MAP MENTIONED HEREIN, AND AS CONTAINED IN DECLARATION SHOWN AS EXCEPTION 6 HEREIN.  
 AFFECTS THE SOUTHERLY 7 FEET.
5. THE MAP MENTIONED HEREIN SHOWS A BUILDING SET BACK LINE 10 FEET FROM RIDGEWOOD DRIVE.
6. COVENANTS, CONDITIONS AND RESTRICTIONS, AS CONTAINED IN:  
 DECLARATION:  
 EXECUTED BY: THE STONESON DEVELOPMENT CORPORATION, A CORPORATION  
 DATED : FEBRUARY 1, 1963  
 RECORDED : FEBRUARY 11, 1963  
 BOOK 4386 OFFICIAL RECORDS OF SAN MATEO COUNTY, PAGE 320 (59822-V).  
 RESTRICTIONS, IF ANY, BASED UPON RACE, COLOR, RELIGION OR NATIONAL ORIGIN ARE DELETED.  
 SAID INSTRUMENT CONTAINS NO EXPRESS WORDS OF FORFEITURE.  
 SAID INSTRUMENT PROVIDES THAT A VIOLATION THEREOF SHALL NOT DEFEAT NOR RENDER INVALID THE LIEN OF ANY MORTGAGE OR DEED OF TRUST MADE IN GOOD FAITH AND FOR VALUE.

Vol 2929 Page 244

EXCHANGE DEED

ORIGINAL

CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation, the first party, hereinafter referred to as the "City," pursuant to Ordinance No. 9224, File No. 13435, Series 1939, enacted by the Board of Supervisors on July 18, 1955, and approved by the Mayor on July 20, 1955, hereby quitclaims to THE STONESON DEVELOPMENT CORPORATION, a corporation, the second party, hereinafter referred to as "Stoneson", all of its right, title and interest in and to the following described real property:

5  
50

All that real property described as Parcel 2 in the deed from the Capuchino Land Company, dated April 9, 1943 and recorded April 21, 1943 in Volume 1060 at page 90, Official Records of San Mateo County, California, and all of Parcel "B" as described in the joint easement deed between the Capuchino Land Company and the City, dated April 18, 1944 and recorded May 26, 1944 in Volume 1112 at page 406, Official Records of San Mateo County, California, included within the following described land situated in the County of San Mateo, State of California:



A strip of land 40 feet wide, being 10 feet measured at right angles southerly and 30 feet measured at right angles northerly from the following described line, and the easterly and westerly extensions thereof:

COMMENCING at a point in the southeasterly boundary of Parcel 1 in the hereinabove mentioned deed from Capuchino Land Company, dated April 9, 1943, distant along said boundary south 52° 08' 40" west 50.00 feet from the most easterly corner of said Parcel 1; thence from the point of commencement south 62° 44' 20" east 279.97 feet; thence south 71° 50' 20" east 262.55 feet; thence south 62° 21' 20" east 239.02 feet; thence south 71° 12' 50" east 219.89 feet to Point "C" described in the hereinbefore mentioned joint easement deed; thence south 71° 12' 50" east 10.00 feet; thence south 63° 56' 50" east 222.42 feet; thence north 89° 10' 40" east 150.34 feet; thence north 74° 02' 40" east 173.57 feet to a point in the common boundary line between the lands of said Stoneson Development Corporation and the lands of E. L. Labadie, acquired from Charlotte D. Alford by deed dated October 27, 1934 and recorded November 21, 1934 in Book 642 at page 11 of Official Records, San Mateo County; said point being distant along said common boundary line south 32° 29' 40" east 1045.44 feet from an iron monument, marking the most northerly corner of the 67.47 acre tract, described in the hereinbefore mentioned joint easement deed.

CONTAINING 1.415 acres, more or less.

The easterly boundary of said strip of land being the common boundary between the lands of said Stoneson Development Corporation and the lands of said E. L. Labadie and the westerly

NO-4  
cont'd.

CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation, the first party, hereinafter referred to as the "City," pursuant to Ordinance No. 9224, File No. 13435, Series 1939, enacted by the Board of Supervisors on July 18, 1955, and approved by the Mayor on July 20, 1955, hereby quitclaims to THE STONESON DEVELOPMENT CORPORATION, a corporation, the second party, hereinafter referred to as "Stoneson", all of its right, title and interest in and to the following described real property:

5 50



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A strip of land 40 feet wide, being 10 feet measured at right angles southerly and 30 feet measured at right angles northerly from the following described line, and the easterly and westerly extensions thereof:

COMMENCING at a point in the southeasterly boundary of Parcel 1 in the hereinabove mentioned deed from Capuchino Land Company, dated April 9, 1943, distant along said boundary south 52° 08' 40" west 50.00 feet from the most easterly corner of said Parcel 1; thence from the point of commencement south 62° 44' 20" east 279.97 feet; thence south 71° 50' 20" east 262.55 feet; thence south 62° 21' 20" east 239.02 feet; thence south 71° 12' 50" east 219.89 feet to Point "C" described in the hereinbefore mentioned joint easement deed; thence south 71° 12' 50" east 10.00 feet; thence south 63° 56' 50" east 222.42 feet; thence north 89° 10' 40" east 150.34 feet; thence north 74° 02' 40" east 173.57 feet to a point in the common boundary line between the lands of said Stoneson Development Corporation and the lands of E. L. Labadie, acquired from Charlotte D. Alford by deed dated October 27, 1934 and recorded November 21, 1934 in Book 642 at page 11 of Official Records, San Mateo County; said point being distant along said common boundary line south 32° 29' 40" east 1045.44 feet from an iron monument, marking the most northerly corner of the 67.47 acre tract, described in the hereinbefore mentioned joint easement deed.

CONTAINING 1.415 acres, more or less.

The easterly boundary of said strip of land being the common boundary between the lands of said Stoneson Development Corporation and the lands of said E. L. Labadie and the westerly boundary line of said strip of land being the southeasterly boundary of Parcel 1 in the hereinbefore mentioned deed.

237465

# Noise & Health

*A Bimonthly Inter-disciplinary International Journal*



Home

[\[Download PDF\]](#)**ARTICLE****Year : 2012 | Volume : 14 | Issue : 61 | Page : 297--302****Effects of environmental noise on sleep****Kenneth I Hume<sup>1</sup>, Mark Brink<sup>2</sup>, Mathias Basner<sup>3</sup>,**<sup>1</sup> Centre for Aviation, Transport and the Environment, Manchester Metropolitan University, Manchester, M1 5GD, United Kingdom<sup>2</sup> ETH Zürich, D-MTEC Public and Organizational Health, WEP H17, CH-8092 Zürich, Switzerland<sup>3</sup> Division of Sleep and Chronobiology, Department of Psychiatry, University of Pennsylvania Perelman School of Medicine, Philadelphia, Pennsylvania, USA**Correspondence Address:**

Kenneth I Hume

Centre for Aviation, Transport and the Environment, Manchester Metropolitan University, Manchester, M1 5GD  
United Kingdom**Abstract**

This paper summarizes the findings from the past 3 year's research on the effects of environmental noise on sleep and identifies key future research goals. The past 3 years have seen continued interest in both short term effects of noise on sleep (arousals, awakenings), as well as epidemiological studies focusing on long term health impacts of nocturnal noise exposure. This research corroborated findings that noise events induce arousals at relatively low exposure levels, and independent of the noise source (air, road, and rail traffic, neighbors, church bells) and the environment (home, laboratory, hospital). New epidemiological studies support already existing evidence that night-time noise is likely associated with cardiovascular disease and stroke in the elderly. These studies collectively also suggest that nocturnal noise exposure may be more relevant for the genesis of cardiovascular disease than daytime noise exposure. Relative to noise policy, new effect-oriented noise protection concepts, and rating methods based on limiting awakening reactions were introduced. The publications of WHO's "Night Noise Guidelines for Europe" and "Burden of Disease from Environmental Noise" both stress the importance of nocturnal noise exposure for health and well-being. However, studies demonstrating a causal pathway that directly link noise (at ecological levels) and disturbed sleep with cardiovascular disease and/or other long term health outcomes are still missing. These studies, as well as the quantification of the impact of emerging noise sources (e.g., high speed rail, wind turbines) have been identified as the most relevant issues that should be addressed in the field on the effects of noise on sleep in the near future.

**How to cite this article:**Hume KI, Brink M, Basner M. Effects of environmental noise on sleep. *Noise Health* 2012;14:297-302**How to cite this URL:**Hume KI, Brink M, Basner M. Effects of environmental noise on sleep. *Noise Health* [serial online] 2012 [cited 2013 Apr 26 ];14:297-302**Available from:** <http://www.noiseandhealth.org/text.asp?2012/14/61/297/104897>**Full Text****Introduction**

It is well established that noise can disturb sleep, and if this disturbance is severe and frequent enough it can lead to significant fragmentation and sleep deprivation which seriously affects our physical and mental health. [1] In the early days of modern sleep research, there was a considerable emphasis on understanding the importance of the type and structure of sleep in terms of its electro-physiologically defined sleep stages and the nature of recovery sleep following sleep deprivation. [2] However, it is unclear how the well documented deleterious effects of these early sleep deprivation studies can be applied to environmental noise disturbed sleep, as the typical level of environmental noise is usually not severe enough to produce the same degree of sleep deprivation and/or fragmentation. [3]

Nonetheless, it has been clearly established that we can have autonomic responses to noise at low levels that do not produce wakefulness, [4] as well as responses that could be described as minor fragmentation which includes shifts to lighter sleep stages, movement and/or brief wakefulness which are frequently associated with limb and body movement. [5] In addition, there is clear evidence that night-time noise has been associated with cardiovascular disease [6] and stroke in the elderly, [7] and that autonomic arousals habituate to a lesser degree to noise than cortical arousals. [8] What is lacking is evidence of a causal pathway that directly links noise (at ecological levels) and disturbed sleep with cardiovascular disease. A large prospective cohort study measuring (noise-induced) sleep disturbance at baseline and following subjects over several years could provide this evidence, but this type of study would be expensive and the results would not be available for a number of years.

One factor that makes it difficult to determine clear exposure–response relationships for these autonomic and minor sleep fragmentation responses to noise is that they also occur naturally in the absence of noise and any other obvious external agent. The dilemma has been how to establish an acceptable point at which the additional reactions to noise clearly and demonstrably result in health impairments. [9] Adding to the dilemma is the large number of uncontrolled non-auditory factors e.g., annoyance, work and psychosocial stress, and personal characteristics like noise sensitivity that is known to affect our sleep and reaction to noise.

### Transportation Noise

The past 3 years has seen continued interest in the effect of transportation noise on sleep. This has been driven mainly by the continued and planned expansion of aviation and high speed trains, which is considered to develop faster than noise suppressing technology. The future predictions for air-travel volumes indicate considerable growth and increased noise which outweighs the reductions due to quieter jet aircraft and other noise mitigation measures. In 2006, the global population exposed to aircraft noise with 55 L DN or above was approximately 21 million people. This is expected to increase at a rate of 0.7 to 1.6% per year, while passenger traffic is expected to grow at an average rate of 4.8% per year through the year 2036. [10] The main focus of research into noise disturbed sleep over the last couple of decades has been in Europe. This has in part been a consequence of the realization of the Environmental Noise Directive (END) of the European Union which required governments to provide detailed noise maps of urban conglomerations in member states and then to produce Action Plans on the basis of these maps, which should outline how citizens living in the particularly noisy areas in the maps are going to gain relief. [11] This implies the need for quantification of the effectiveness of practical intervention measures that may be applied.

Over the past 3 years, the FAA (US) have set about developing a "Research Roadmap" for future work into "Advancing Aircraft Noise Impacts Research" with a main emphasis on sleep disturbance and annoyance caused by aircraft noise. [12] The essential aim of such research is to provide the best evidence for the formulation of legislation to regulate noise that has the potential to harm citizens. The research development process for the Noise Research Roadmap started with the formation of two small groups of experts and stakeholders in sleep disturbance and annoyance generation. This focus was broadened in 2009 at Euronoise in Edinburgh and Inter-

NO-5  
cont'd.

noise in Ottawa where an International Forum on Aircraft Noise Impacts was held and further developed with Annual Research Roadmap Meetings in Washington in 2010 and 2011 (see [www.fican.org/faaworkshop.html](http://www.fican.org/faaworkshop.html) for details).

The differences in noise-induced sleep disturbance due to different transportation mode (air, road, and rail singularly and in combinations) has received considerable debate and conjecture in the literature. A recent laboratory based study has shed considerable light on the topic. [8] The authors studied 72 subjects (32 male) for 11 consecutive nights with 0, 40, 80, and 120 noise events employed in a balanced design, in terms of number of noise events, maximum sound pressure level, and equivalent noise load. The results showed that road traffic caused the most obvious changes in sleep structure and continuity whereas air and rail was considered more disturbing subjectively. This was attributed to road traffic noise events being too short to be consciously perceived by the subjects that had awoken in response to the event. The results also showed that while annoyance was greater for aircraft noise, cortical and cardiac responses during sleep were lower for air compared to road and rail traffic. A fascinating result was that most (>90%) of the noise induced awakenings merely replaced awakenings that would have occurred spontaneously, which helped to preserve sleep continuity and structure despite the noise. This suggests that within limits there is some homeostatic mechanism for internal monitoring and control of waking arousals (or maintaining sleep) that are allowed during each night's sleep.

Noise policy and legislation are most often based on average noise levels (like L DEN or L night ). Obviously, a lot of information about traffic noise patterns and sound levels of individual vehicles is lost in this process. [1] A noise protection concept based on single aircraft noise events that explicitly limits the number of additional awakenings induced by aircraft noise was first published in 2006 and is used at airport Leipzig/Halle. [13] The concept has recently been adopted by Zurich airport [14] and Frankfurt airport, [15] where additional awakenings are used in the framework of noise effect indices. These indices are noise assessment instruments that express the effect of aircraft noise either as a figure that equals the amount of people that are relevantly affected by the noise, or, in the case of night noise, the total number of awakening reactions elicited. Also, more complex Markov state transition models that can be used to predict the effect of different traffic patterns on sleep structure, not just awakenings, were recently published. [16] The authors showed that high traffic volumes during the shoulder hours of the day are detrimental for people who go to or have to go to bed either early or late (e.g., children, shift workers).

### Other Environmental Noise Sources

There has been a growing interest in the negative health effects associated with other environmental noise producers, particularly wind turbines, which are becoming an increasing feature on the landscape and coastal seascapes as a result of the global drive for non-carbon energy production. [17],[18] Until now, most research into wind turbine noise effects considered annoyance, but a socio-acoustic survey including self-reported sleep disturbance due to wind turbine noise has been published recently. [19]

There are other established areas of noise-disturbed sleep research such as those concerned with assessing and improving the negative effect on health, healing, and recuperation of noise in hospitals and other health care facilities. [20] A recent laboratory study on 12 healthy adult subjects developed sleep arousal probability threshold curves for 14 sounds typical in a hospital environment. [21] The most disturbing sounds were IV pump alarms and phone "rings." For each of the common hospital noises, recommendations were provided to improve the acoustic environment and reduce the level of disturbance. Utilizing the same data set, it was found that the density of sleep spindles, a characteristic feature in the electroencephalogram of stage 2 sleep, in noise-free nights predicted arousal probability to noise stimuli in subsequent nights. [22] If replicated in other data sets, this may be the first physiologic marker of noise sensitivity, which is known to vary considerably between subjects. [23] The authors also found that EEG alpha activity, another EEG feature that is a typical sign of the wake state, immediately prior to noise stimulus application was associated with higher arousal probabilities, and may thus be

↑ NO-5  
cont'd.

a marker of immediate sleep stability. [24]

A Swiss study investigated 27 subjects living in the vicinity of churches that ring bells during the night with polysomnography for 4 consecutive nights. [25] At the same maximum sound pressure level, they found awakening probabilities to be higher relative to a similar study investigating the effects of aircraft noise on sleep. [13] The authors estimate that approximately 40 000 inhabitants in the Canton of Zurich on average experience one or more additional awakenings induced by church bell noise every night alone. [26] Thus, the overall public health impact of nocturnal church bell noise may be major, since church bell ringing during the night is a common phenomenon practiced in many countries around the world.

### Epidemiologic Evidence

The epidemiologic evidence that long-term traffic noise exposure increases the incidence of cardiovascular disease has increased considerably since 2008. [6],[7],[27],[28],[29],[30] At the same time, the evidence increases that nocturnal noise exposure may be more relevant for the genesis of cardiovascular disease than daytime noise exposure. For aircraft noise, the HYENA study found a non-significant decrease in the risk of hypertension for daytime LA, eq (OR 0.928, P = 0.190), but a significant increase for L Night (1.141, P = 0.031, both per 10 dB increase). [6] Babisch et al. showed more than 10 years ago that road traffic noise exposure increases the risk of cardiovascular disease more in those who sleep with open windows or whose bedroom is oriented toward the road. [31] Lercher et al. found that the risk for hypertension increased in those who slept with open windows during the night, but it decreased in those who had sound insulation installed or where the bedroom was not facing the main road. [32] A recent Swiss study presented evidence of an adverse effect of railway noise on blood pressure, which was especially associated with night time exposure. [33] The same study also underlined the need to investigate potentially vulnerable groups, as effects of noise exposure were particularly high among persons with physician-diagnosed hypertension, cardiovascular disease, and diabetes.

### Recommendations of the WHO - Europe

WHO - Europe has continued to be instrumental in driving the environmental health agenda in Europe and published the Night Noise Guidelines for Europe which summarize the deliberations of many experts and provide a clear and simple guide for planners and regulators. [34] The NNG summarize the relationship between night noise and health effects into four ranges of continuous outside sound level at night (L Night ):

<30 dB - Although individual sensitivities and circumstances differ, it appears that up to this level no substantial biological effects are observed.

30-40 dB - A number of effects on sleep are observed from this range: Body movements, awakening, self-reported sleep disturbance, and arousals. The intensity of the effect depends on the nature of the source and the number of events. Vulnerable groups (e.g., children, the chronically ill and the elderly) are more susceptible. However, even in the worst cases the effects seem modest.

40-55 dB - Adverse health effects are observed among the exposed population. Many people have to adapt their lives to cope with the noise at night. Vulnerable groups are more severely affected.

>55 dB - The situation is considered increasingly dangerous for public health. Adverse health effects occur frequently, a sizeable proportion of the population is highly annoyed and sleep disturbed. There is evidence that the risk of cardiovascular disease increases.

More recently, WHO - Europe (2011) has reported on the burden of disease as a result of the growing concern of the public, environmental health agencies, and policy makers in Europe, in terms of disability-adjusted life-years

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(DALYs) lost due to environmental noise. [35] The findings suggest that sleep disturbance, due mainly to road traffic noise, constitutes the heaviest burden followed by annoyance which account for 903 000 and 587 000 DALYs, respectively. The other factors associated with environmental noise are ischemic heart disease (61 000 DALYs), cognitive impairment in children (45 000 DALYs) and tinnitus (22 000 DALYs). The report concludes with the estimate that at least one million healthy life years are lost every year from traffic related noise in Western Europe.

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cont'd.

### Recent Reviews and Special Issues

In 2010, there was a Special Issue of the Noise and Health journal published (12;47) devoted to noise and sleep which contained some of the papers and deliberations presented at the ICBEN-2008 conference. As a result of this publication, two points of view emerged which were reflected in the Letters to the Editor in a later issue of Noise and Health (12;49) about whether or not physiological responses to noise during sleep have meaningful health consequences that are amenable and valid for the construction of exposure-response curves. [36],[37] One realization to emerge from the debate was the difference between the European view of health, which can include mental and physical well-being, not just the absence of disease, which is basically in line with the WHO definition of health, adopted in their 1946 constitution, and the US position which tends to be more pragmatic. Elucidation of the mechanism by which noise-disturbed sleep leads to significant reduction in health is a primary goal to resolve this issue.

There have been a number of reviews of the literature in the past 3 years on the effect of noise on sleep. The BEL Report set out to estimate dose-response relationships between noise exposure and health impacts in the UK which focused on the "key" outcomes of cardiovascular effects, hypertension, and sleep disturbance. [38] However, they found that despite sleep disturbance being a well developed area with robust data, no consensus on any single dose-response relationship between noise level and sleep disturbance could be used to inform a cost-benefit analysis. Also, they concluded that no quantitative link could be established between sleep disturbance due to noise and any long term adverse health effects. But it was possible to find a robust link between noise exposure and hypertension. The authors considered that further research was needed to investigate the links between noise and air pollution and links between transient sleep disturbance and long term health effects.

Another review of aircraft noise and sleep disturbance in 2009 was carried out for the CAA (UK) and found results inconclusive and often contradictory with considerable practical design difficulties. [39] The author suggested the need for large-scale long-term epidemiological field studies that include cardiovascular and hormonal measures at various exposure sites. The study should include actigraphy and some polysomnography for calibration and validation, to resolve the links between environmental noise, sleep disturbance, and health.

A further review funded by the Partnership Program in the US and Canada concluded that aircraft noise can cause sleep fragmentation which can involve increases in the number and length of awakenings, reduced slow wave (SWS) and rapid eye movement (REM) sleep, and increased heart rate and blood pressure, reduced subjective sleep quality, increased sleepiness and annoyance, but only a small effect on performance next day. [40]

#### Outstanding issues and further research needs

There are a number of outstanding issues which need to be addressed in any further research work. First and foremost, as it is currently impossible to attribute long term health effects directly to sleep disturbance and as it takes several years for these illnesses to develop, studies demonstrating a causal pathway that directly links noise (at ecological levels) and disturbed sleep with cardiovascular disease and/or other long term health outcomes are needed. [41]



There are various methods employed in sleep recording and each has its own advantages and definition of disturbed sleep, so some appropriate combination of methods would seem the most acceptable way forward to reduce the cost and "method bias." [42]

Site and subject selection in any future field study are important as it seems plausible that a good proportion of residents near to airports or busy roads etc may represent "noise survivors" who did not avoid buying a property near to a major noise producer and individuals who have not moved away because they are able to cope with the noise. However, there is no direct evidence to date that this self-selection bias is in operation.

Age and socioeconomic status are major co-factors in considerations of noise and health and its end-points e.g., sleep disturbance, where healthy young adults tend to be generally good sleepers while the middle-aged and elderly tend to have poorer sleep with increased susceptibility to disturbance and fragmentation as a result of noise. In most countries, higher socio-economic status allows individuals to choose homes in more desirable areas which usually involve higher levels of "peace and tranquillity" and are generally able to afford higher levels of sound attenuation in city center locations.

It is hard to imagine an individual who suffers routine sleep disturbance who is also not highly annoyed with the noise source, so the strong links between annoyance and sleep disturbance need to be considered in the design and planning, in addition to annoyance reactions without associated sleep disturbance.

Someone who lives in a noisy neighbourhood and is disturbed at night by noise is likely to have a significant daytime noise load particularly at weekends, so the sleep disturbance and its long term effects may be a result of both exposures and this needs careful consideration.

The potential link between air and noise pollution is frequently mentioned but rarely studied. An exception was a study that found that exposure to residential road traffic noise was associated with a higher risk of stroke among older people (>64.5 year) after controlling for air pollution. [7]

A very recent submission from the ENNAH project to the EU provides a clear lead and summarizes what new research is needed: "New research on sleep should address the mechanisms by which noise disturbs sleep, and how noise-disturbed sleep may lead to health effects. This insight is needed to predict the impact of noise events and to evaluate the effectiveness of possible measures to reduce the impact of night-time noise exposure. There needs to be an appreciation of groups vulnerable to sleep disturbance and studies of sleep in those with chronic diseases. Future research may include assessing the effects of combined noises and combined environmental stressors on sleep. This may be carried out in extended field studies with new cost-effective methods of recording disturbance including cardiac arousals, as well as established measurement tools such as actimetry and subjective assessment." Furthermore, studies are needed to quantify the impact of emerging noise sources such as high speed rail and wind turbine noise and the impact of interventions to reduce noise.

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Friday, April 26, 2013

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**From:** [Steve Lawrence](#)  
**To:** [Smith, Steve](#)  
**Subject:** Re: Peninsula Pipeline Seismic DEIR -- comment  
**Date:** Monday, April 01, 2013 1:42:56 PM

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On 4/1/2013 12:36 PM, Smith, Steve wrote:

Do you prefer a hard copy of the RTC or is a CD-ROM OK?

CD-ROM. If the Responses to Comments is posted online, a link to that, or attachment pdf, would suffice.

**From:** [Steve Lawrence](#)  
**To:** [sarah.jones@sfgov.org](mailto:sarah.jones@sfgov.org); [Smith, Steve](#); [Zhang, Yin Lan](#)  
**Subject:** Peninsula Pipeline Seismic DEIR -- comment  
**Date:** Friday, March 29, 2013 5:46:05 PM

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> pg 1-3: "to maintain reliability during a major seismic event." I believe you mean AFTER a major seismic event. A pipeline conveys water. If it stops doing so reliably *during* a seismic event, that is for a matter of seconds. The important thing is that the pipeline not fail--leak--so that it can function after the quake.

ES-11

> "to meet current seismic standards" This is vague and confusing. You are designing for a 7.9 quake. The lines need to survive a 7.9 quake. Your work should so ensure. Meeting some vague standard is not a proper goal, nor does it have meaning; there is no "current seismic standard" for a pipeline. YOU set the standard in the PEIR: survive a 7.9 quake on the San Andreas.

ES-11

There is a lot of vagueness in "objectives." The goal is for the pipelines three to survive a 7.9 quake without damage, or at least without so much damage that they must be taken out of service. "Quake of 7.9--no significant damage" would be better as an objective.

> 1-99, alternatives. Why not have an alternative--for one or more of the lines--that involves preparing for line breakage? In the best of worlds, you are ensuring only against lines not breaking (leaking) in a quake up to 7.9 in size. That leaves the possibility that a larger quake happens, and the repaired lines break. In which case you would be better off with: staged pipe sections designed and stored in a manner so that the line may quickly be repaired after a quake damages it. You close valves, shutting off water (automatically) when the quake happens. You prepare for where the water in the line will go, minimizing damage it will cause. You prepare for rapid response: perhaps with plastic pipe (PE for example). After the quake, the line re-opens fairly quickly. Should this not be an alternative? (Slip-lining is a straw man alternative, I suspect.)

ES-12

Steve Lawrence

RECEIVED

APR 19 2013

4/14/13.

Dear Miss Jones

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

This letter is in reference to a telephone conversation that I had with Steven Smith on 4/28/13. Mr. Smith told me to send this letter to you and that it would be routed to him.

This letter is showing my concern and to reiterate on my conversation with Mr. Smith in reference to the public notice sent to my home in reference to the Perakute Pipelines Seismic Upgrade Project.

As I had stated in our conversation that I am very concerned about this project and the long trucks with long loads of equipment and trucks out and the noise level, air quality and many other significant impacts relating to this project.

I live on Ridgewood Lane and this is a quiet residential area with

GC-9  
TR-18

families with young children. The  
Meadow School is just a few blocks  
from Ridgwood Drive and this would  
be very dangerous for children going to  
and from school.

My other concern is the environment  
which would be quite an impact on the  
families that live in this area, also  
all the wildlife living in the open  
space.

My only hope is that you might  
find another route for this project,  
and my deep concern being a  
resident living on Ridgwood Drive.

Sincerely,

Richard Taylor  
1156 Ridgwood Drive  
Millbrook, Calif 94030.

650-588-1710

TR-18  
cont'd.

GC-10

AL-3



Clara R. Taylor  
1156 Ridgewood DR  
Millbrae, CA 94030



SAN FRANCISCO CA 940

17 APR 2015 PM 5 L

*Sarah Jones*  
*Activ. Environmental Policy Officer*  
*San Francisco Planning Dept.*  
*1650 Mission Street*  
*San Francisco, Calif 94103*

*Slide 400*

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**ATTACHMENT B**

**DRAFT EIR HEARING TRANSCRIPTS**

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**Table B-1  
Draft EIR Hearing Transcripts**

Letter Code	Full Name	Comment Type	Topic Code	Topic Title
TR.1	(1) Michael Allen, General Counsel, Shelter Creek Condominiums; April 16, 2013  (2) Alan Wong, Deacon, San Bruno Chinese Church; April 16, 2013  (3) Anthony Cheung, Deacon, San Bruno Chinese Church; April 16, 2013  (4) Charlie Royce, Director of Administration for Central Peninsula Church; April 16, 2013	Transcript	GC-11	Change made to staging area at Peninsula High School (no longer staging on the basketball courts).
			PD-3	Project permits required include haul, encroachment permits, tree permits, and sewer connection permits.
			TR-18	Construction traffic safety concerns to nearby schools and churches.
			NO-2	A contingency for relocation of residents should be provided due to noise levels.
			TR-15	Traffic flow into/out of garages at Shelter Creek Condominiums and construction vehicle and resident parking access.
			TR-16	Alternate locations for trash bins at Shelter Creek Condominiums.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			GC-12	Construction truck trips and impact on neighborhood.
			GC-13	Use of a portion of the San Bruno Chinese Church parking lot for staging area.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
			TR-19	Construction and church traffic concerns at San Bruno Chinese Church and construction hours.
TR.2	Michael J. Antonini, Commissioner, San Francisco Planning Commission; April 18, 2013	Transcript	GC-14	Segmental pipe replacement.

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STATE OF CALIFORNIA  
CITY AND COUNTY OF SAN FRANCISCO

ORIGINAL

SAN FRANCISCO PLANNING DEPARTMENT  
ENVIRONMENTAL PLANNING DIVISION  
PUBLIC HEARING  
PENINSULA PIPELINES SEISMIC UPGRADE PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT  
TUESDAY, APRIL 16, 2013

CASE NO. 2011.0123E

STATE CLEARINGHOUSE NO. 2011112028

REPORTED BY: E. BRUIHL, CLR, RPR, CSR NO. 3077

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A P P E A R A N C E S

MODERATOR: Timothy Johnston  
Environmental Review Coordinator

San Francisco Planning Department:  
Denise Heick, Environmental Consultant Lead, URS

San Francisco Public Utilities Commission (SFPUC):  
Calvin Huey, PE, Project Manager  
Heather Manders, PE, Project Engineer  
Yin Lan Zhang, Environmental Project Manager  
Maureen Barry, Communications Liaison  
Sam Young, PE, Regional Project Engineer



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P R O C E E D I N G S

TUESDAY, APRIL 16, 2013

MR. JOHNSTON: This is the first of two hearings. The next hearing will be on Thursday in San Francisco before the Planning Commission and it will give the same opportunity to offer comments on the EIR.

Let's see. Oh, it says we're starting at 7:00, I'm sorry. Okay, then we better wait. 6:30 is to view the exhibits. So you folks were really early (laughter). I thought I was getting a little nervous having to wait around too long, so my apologies. I guess we do have to wait until 7:00 for the notice, for the actual hearing.

So, in the meantime, help yourself to refreshments and we'll start the formal process into the hearing. Do you have any questions on the... (Pause)

SPEAKER: Okay.

MR. JOHNSTON: Where I left off last time, this is the first of two hearings. The second one will be on Thursday at the Planning Commission.

Here's the agenda for tonight's meeting.

1 We have a little bit of a preamble with a welcome,  
2 meeting reminders and introductions and then  
3 project overview, before we get to the public  
4 hearing part of the meeting where we will get your  
5 comments on the Draft EIR and then we'll wrap it up  
6 after we hear from all the who want to speak  
7 tonight. Next one?

8 So hopefully -- we do appreciate it, if you  
9 haven't, if you would please sign in so we can keep  
10 in touch with you for the rest of this process.  
11 When the next phase of the document comes out, we  
12 want to let you know that that's available for  
13 review.

14 Also, if you plan on speaking tonight, we  
15 would appreciate that you fill out a speaker card.  
16 Maureen, do you have those?

17 MS. BARRY: Yes.

18 MR. JOHNSTON: This is so that you get your  
19 name and contact information written down correctly  
20 and also so that we can enter that into the record.  
21 This is a public process where we have to keep  
22 track of these things.

23 And then if you have comments, but you  
24 don't want to speak, you can fill out a comment  
25 form and Maureen has those in the back, the blue

1 forms, if you would just rather just write down  
2 your comments instead of speaking them, those are  
3 available.

4 Also, before we get too far along,  
5 restrooms are down the hall to my right, I think  
6 back there. Please turn off your cellphone or put  
7 it on vibrate, if you don't mind.

8 We have a court reporter here tonight who's  
9 making a transcript of the hearing for the record  
10 to make sure we get everything down accurately.  
11 Next slide?

12 So again, I'm standing in for Steve Smith  
13 tonight. My name is Tim Johnston. Denise Heick is  
14 the representative from URS who is -- URS is the  
15 consulting firm that's advising the Planning  
16 Department on helping us with the EIR. Also, we  
17 have some folks here from the PUC. You've met a  
18 bunch of them already including Calvin Huey who's  
19 the project manager, Heather Manders is the project  
20 engineer, and then we have Yin Lan Zhang who's the  
21 environmental project manager. We have Maureen  
22 Barry here from SFPUC Communications and Sam Young  
23 as well, who's the regional project engineer.

24 So now I'm going to turn over to Calvin  
25 who's going to give you a brief overview of the

1 project is the subject of the Environmental Impact  
2 Report that we just released.

3 MR. HUEY: Excuse me one second. I'm just  
4 going to make sure -- I know you met Tim Johnston.  
5 Excuse me one second. I think we are stopping  
6 here.

7 FEMALE SPEAKER: Can you speak louder,  
8 please?

9 MR. HUEY: Yeah, I'm going to give it a --  
10 I'm sorry. We're going to ask you -- we intended  
11 to cut out some of these slides. The presentation  
12 was shorter, so we'll start with this.

13 This is the San Francisco Public Utilities  
14 Service area. The orange shaded area there  
15 represents the area in which we serve our  
16 customers. There are 2.6 million customers that  
17 receive water from the Hetch Hetchy Reservoir. The  
18 Hetch Hetchy Reservoir provides 85 percent of the  
19 water and then 15 percent of the remaining water  
20 comes from our local reservoirs. We are on the  
21 East Bay and also on the West Bay. The Hetch  
22 Hetchy Regional Water System is a gravity-based  
23 system. It was originally built in the 1900s and  
24 it's considered to be an engineering marvel. It is  
25 an extensive system as water travels from Hetch

1 Hetchy, down 167 miles to our taps. So our system  
2 is an aging system. It is well over a hundred  
3 years and many portions of it are being updated  
4 now, right? Next, please.

5 So the system needs fixing. As you can see  
6 with the previous slides, it has some leaks along  
7 the way. As you can see here, the Hetch Hetchy  
8 System goes from the east to the west and it  
9 crosses three major faults; the Calaveras Fault,  
10 the Hayward Fault, and the San Andreas Fault.

11 Now, recent investigations have indicated  
12 that a very significant earthquake would be  
13 catastrophic to the system. And then because of  
14 that we won't be able to reliably provide water to  
15 our customers for as many as several months -- up  
16 to two months.

17 So in San Mateo County, the San Andreas  
18 Fault is adjacent to many of our facilities here.  
19 Fortunately for us, the WSIP program has completed  
20 most of these projects and more than many, half of  
21 within the peninsula are actually still within  
22 construction right now. So this project, the  
23 Peninsula Pipelines Seismic Upgrade Project, it's  
24 one of the last projects within the Water System  
25 Improvement Program. Next, please.

1           So the tipping point was way back in the  
2           (inaudible) 1989 we had a major earthquake and that  
3           affected us. So because of this, we have 80 plus  
4           projects, total cost of over \$4.6 billion and the  
5           completion date of the whole program is around the  
6           end of 2016. Okay, next one.

7           So the goal of the program is to deliver  
8           among four goals; seismic reliability, water  
9           quality, delivery reliability, and water supply.

10           So this is an overview of our project area,  
11           with the Peninsula Pipelines Seismic Upgrade  
12           Project. The project is located at five different  
13           sites: within the City of Colma, within South San  
14           Francisco, within San Bruno -- there are two sites  
15           at San Bruno -- San Bruno North and San Bruno  
16           South; and the last site was in Millbrae.

17           So why would we need this project? We have  
18           an aging system that's well over a hundred years  
19           old. It's vulnerable to seismic activity from  
20           fault crossings, from landslides, liquefaction and  
21           ground-shaking.

22           So what is the project goal over here?  
23           Well it's to improve seismic reliability of the  
24           three major transmission lines that deliver water  
25           from the Peninsula to the Harry Tracy Water

1 Treatment Plant and to the San Pedro Valve Lot. On  
2 the next slide I will explain a little bit more  
3 about how this comes into play.

4 Within the Peninsula Watershed area, its a  
5 size is 23,000 acres. Water that is transmitted  
6 from the Hetch Hetchy Water System, over 167 miles,  
7 either is delivered directly to our customers in  
8 the city or else is stored in these reservoirs  
9 here, which is the blue for the record. And  
10 because of the storage there, well, it also  
11 provides an emergency backup system and also some  
12 supplemental water supply for the entire Peninsula.

13 Harry Tracy is located way up here -- right  
14 here -- and is the sole treatment plant to serve  
15 this Crystal Springs Reservoir System and  
16 ultimately, water that is treated here is delivered  
17 to the three pipelines that goes out to San Pedro  
18 Valve Lot and ultimately it is delivered into the  
19 city. Okay, next slide, please.

20 So the proposed project more or less  
21 addresses four different types of hazards. For the  
22 hazard of fault crossing and landslide, the project  
23 proposes to replace approximately 3,120 feet of  
24 pipelines at two fault crossing locations in the  
25 cities of San Bruno and Millbrae. To address the

1 liquefaction hazard, the project proposes to  
2 replace approximately 1,420 feet of pipelines in  
3 the cities of Colma and South San Francisco; and to  
4 address the ground-shaking hazard, the project  
5 proposes to structurally support pipelines within  
6 an existing tunnel, within the City of San Bruno.  
7 Next, please.

8           So the next few slides we'll go through  
9 each of the five sites. So that the project work  
10 at Colma, basically, red, if we can just bring up  
11 the overall legend? Red is our proposed  
12 construction area. The purple hatch is the  
13 proposed staging and spoils area. The black dotted  
14 lines are actually the proposed access routes to  
15 the site. So starting at Colma, it is located at  
16 Serramonte Boulevard between the Kohl's side of the  
17 store and the nearby dealerships. And the proposed  
18 project will replace approximately 700 feet of a  
19 54-inch pipeline, between Serramonte Boulevard and  
20 Collins Avenue. And this would address our  
21 liquefaction hazard. The primary method of  
22 construction would be open trench construction and  
23 this work will approximately take two months.  
24 Okay, next slide.

25           And going south, at the South San Francisco



1 site, this site is located off of Westborough  
2 Boulevard, between Arroyo Drive and West Orange  
3 Drive, right here. And this work would replace  
4 approximately 720 feet of a 54-inch pipeline, and  
5 that would address the liquefaction hazard. The  
6 primary construction method will be open trench  
7 construction, however through or underneath  
8 Westborough Boulevard, we propose a jack-and-bore  
9 construction to minimize any impacts to traffic  
10 over here.

11 Additionally, a nearby site at one of our  
12 key facilities will also have a common staging area  
13 which is a few blocks away, where we can store  
14 materials and use materials. Approximate work at  
15 this site will be about three months. Next,  
16 please.

17 So our project work at San Bruno North;  
18 this is located off the 280 off-ramp, as you're  
19 going north, and the work here would be to  
20 structurally support our 54-inch pipeline within  
21 the existing tunnel. We'll access the tunnel via  
22 two pits. One is outside of the off-ramp, the  
23 other one is actually within the main of San Bruno  
24 Avenue. Of course, we'll also address wall sound  
25 mitigation -- I mean, we'll have a traffic pattern

1 to address lane closure here. Work will take  
2 approximately one month over in the San Bruno North  
3 site. Next, please.

4 At the San Bruno South site, which is near  
5 -- this is the area that we're having the hearing.  
6 Well, actually we are replacing two pipelines; a  
7 54-inch pipeline and also a 60-inch pipeline. The  
8 work here addresses the fault crossing and  
9 landslide hazards. The primary method of  
10 construction will be open trench. And then  
11 construction at this vicinity would be about  
12 approximately nine months. Next, please.

13 And then we arrive at the last site, the  
14 Millbrae site. We'll address the fault crossing  
15 hazard by replacing 900 feet of a 60-inch pipeline.  
16 That is off of Ridgewood Way -- Ridgeway, I'm  
17 sorry. It goes through in between two houses  
18 within our right-of-way. It goes through an open  
19 space and then finally it goes through a portion of  
20 the golf course in Millbrae. Of course, it will  
21 also require some tree removals. And then the  
22 primary method of construction is open trench. The  
23 work here would be approximately four-and-a-half  
24 months. Next slide, please.

25 So here's our estimated project schedule.

1 Currently we are under environmental review and  
2 permitting phase. It started in the summer of 2011  
3 and we expect to complete it in the fall of 2013.  
4 Concurrently we are also in project design. We  
5 started in the spring of 2011 and we expect to  
6 complete by the summer of 2013. The proposed  
7 construction will start in early 2014 and end in  
8 2015.

9 And now I'll turn it back over to Tim.

10 MR. JOHNSTON: Thanks, Calvin. Okay so,  
11 this is the moment we've all been waiting for where  
12 we get to hear from you folks -- in just a second.  
13 Again, this is the hearing to receive your  
14 comments. I see we have two speakers; two, maybe  
15 three. Again, you don't have to offer comments  
16 verbally. We will also accept comments in writing,  
17 whether you give them verbally or in writing,  
18 legally it's all the same for the process as far as  
19 we're considered -- yeah, as far as the process is  
20 considered.

21 We won't be responding to your comments  
22 tonight. We will collect them all. The end of the  
23 comment period is April 29th. Should you wish to  
24 mention something else that you forget to mention  
25 tonight, or whatever, there's more time to comment.

1 And then, once we get all the comments, then we  
2 start working on a Response to Comments document,  
3 which is a followup report to the EIR, where we  
4 respond to each of the comments that we got from  
5 the comment period.

6 Let's see, I wanted to mention that the  
7 Draft EIR is also online. It's in print at several  
8 libraries in the area -- we past those slides.  
9 It's a 45-day period. The Responses to Comments  
10 document we expect to release at the end of the  
11 summer 2013 and then by fall of 2013 we would go to  
12 the Planning Department with that Responses to  
13 Comments document to seek certification of the EIR.

14 Once the EIR has been certified, then the  
15 PUC would move forward with a subsequent hearing to  
16 consider whether or not to approve the project.

17 So right now we are only commenting on the  
18 adequacy of the EIR. This is not a hearing about  
19 whether or not the project should or shouldn't be  
20 approved. It's whether or not we got the  
21 environmental analyses correct. So that's what  
22 we're looking for your comment on tonight. And, so  
23 let me call Charlie Royce.

24 MR. ROYCE: Charlie Royce, Director of  
25 Church Administrator for the Central Peninsula

GC-11  
↓

1 Church. We meet here at a proximal site on  
2 Sundays. We also have some midweek meetings here  
3 as well. I'm not particularly fond of the work in  
4 the area, but initially when I went to the first  
5 meeting, the diagram that I was shown included an  
6 area in the basketball court up here, that was  
7 planned to be a staging area. I see that today on  
8 the diagram that that's no longer the case and I  
9 appreciate that not being there, because we are  
10 required through our ministries permit with the  
11 City of San Bruno to use that as our parking on  
12 Sundays. And if it was used for a staging area, we  
13 would have no parking on Sundays or on Wednesdays,  
14 so I appreciate that that's no longer in  
15 consideration.

16 I also want again to say that we're going  
17 to be investing some money to install a driveway,  
18 where there now is a curb and we just want to make  
19 sure our investment stays intact as you will have  
20 heavy equipment going through that area. We are  
21 also concerned about the traffic routing on  
22 Sundays. I realize you're not doing work on  
23 Sundays, but whatever the condition is, we're  
24 concerned about that (inaudible) for us to access  
25 the space, because we did have a EIR done, a

↑ GC-11  
cont'd.

↑ PD-3

↑ TR-18

1 traffic survey for our use up here for our  
2 ministries permit, and we want to make sure that  
3 the impact of the community, with us coming on  
4 Sunday, isn't greater than what we had along that  
5 EIR because then the complaints will be to us as we  
6 come to church -- probably to you guys as well, but  
7 we want to be good neighbors and we don't want to  
8 impact the neighborhood any more than we said we  
9 would and -- than have approval in the city. Those  
10 are my comments.

11 MR. JOHNSTON: Okay, thanks a lot. So, let  
12 me just mention that if you pose questions, we will  
13 interpret those as comments. So like what I heard  
14 tonight, is you have comments about traffic and  
15 land-use impacts. And so those are your concerns  
16 and, you know, we will -- I mean well, you do need  
17 to look at the EIR though to make sure that we have  
18 addressed those concerns for you appropriately in  
19 the draft as it is now and let us know if that --  
20 if we've done an adequate job or not.

21 So, let's see, Michael Allen?

22 MR. ALLEN: I'm Michael Allen. I'm general  
23 counsel for Shelter Creek Condominiums. We're in  
24 the San Bruno South section. And I had three  
25 issues I wanted to address. I'll probably give

↑ TR-18  
cont'd.

↓ NO-2

1 something in writing. I just remembered I was  
2 involved in (inaudible). I've actually been down  
3 this road before. First of all, the project site  
4 for San Bruno South comes very, very, very close to  
5 what's called Building 4 in Shelter Creek. I  
6 believe it's within 40 feet of occupying residents.  
7 It may be 50 feet. And a lot of those folks are  
8 home all day, they don't work. And so we have  
9 serious concerns about sound mitigation issues that  
10 may arise relative to the proximity of those units  
11 to the construction site. And I did read the EIR  
12 and I believe it does indicate that there are  
13 significant impacts for noise in that area and I  
14 didn't see anything in there that suggested that  
15 there were going to be some extraordinary measures  
16 taken for sound attenuation or mitigation in that  
17 area. So that would be my question. Is there any  
18 action being taken to establish sound mitigation in  
19 that area, specifically? I know that there's a lot  
20 of houses along that route, coming down Laurence  
21 (phonetic) and Shelter Creek and I don't know if  
22 you've got sound mitigation planned in those areas.  
23 Nine months of having heavy equipment right outside  
24 of the windows of those particular units is going  
25 to be a problem. That's number one.

↑ NO-2  
cont'd.

1           We've had several meetings at the site with  
2           the project manager and project engineer and  
3           they've been extremely helpful and very cooperative  
4           in looking at the project site and establishing  
5           proper methods of construction. I know it is part  
6           of the EIR process to also deal with traffic  
7           issues. I think from what I've read that those  
8           issues have been appropriately addressed. What  
9           Shelter Creek wants to make sure is that the people  
10          who live there -- it's 1,296 units. It's like a  
11          small town. I think there are about 3,000  
12          residents living within Shelter Creek. They've got  
13          parking lots scattered all over the place and some  
14          of them by virtue of the planned construction  
15          activities aren't going to do -- they're going to  
16          be somewhat landlocked. So either make absolutely  
17          certain that all necessary considerations are taken  
18          so nobody gets locked in, nobody gets locked out;  
19          free flow of traffic in and out, especially during  
20          work hours coming and going. I believe that those  
21          things have been taken care of. I want to make  
22          sure that all those issues are properly taken care  
23          of.

24                 And I think that the last point I've raised  
25          has to do with certain structures. It may not be

TR-15

TR-16



1 necessarily controlled by the EIR. There are some  
2 structures that are built in Shelter Creek and they  
3 are going to be impacted by the construction  
4 activities, specifically since some areas, garbage  
5 enclosures and things of that nature, they're going  
6 to be either eliminated for a time or they'll have  
7 to be relocated and we want to make sure that  
8 proper accountability exists for relocating those  
9 and repositioning them so that that doesn't become  
10 a problem during the construction period.

11 I'm going to try to put some of these  
12 things in writing. I've got to get it done next  
13 week. Actually, the 29th is the cutoff date for  
14 public comments, so I'll try to get something in  
15 writing here before that deadline. Thank you.

16 MR. JOHNSTON: All right, so next we have  
17 Alan Wong and if this is it -- unless anybody else  
18 would like to speak? Go ahead, Alan.

19 MR. WONG: Hi, I'm Alan Wong. I'm a church  
20 deacon. I have a comment concerning just a couple  
21 of the areas. I think some previous speaker, I  
22 mean Anthony has already mentioned about the  
23 traffic condition they're talking about. The main  
24 thing is that we have a number of people who join  
25 our club on Mondays and Friday only to use

↑ TR-16  
cont'd.

TR-19  
↓

1 (inaudible), but you're working seven days a week,  
2 I'm sure, to do anything; is it correct?

↑ TR-19  
cont'd.

3 MR. JOHNSTON: Calvin, is your private  
4 proposal for construction hours?

5 MR. HUEY: I --

6 MR. WONG: And I don't know if that's --

7 MR. HUEY: Monday to Friday.

8 MR. WONG: Monday to Friday.

9 MR. HUEY: Yes.

10 MR. WONG: Oh okay, good enough. One of my  
11 concerns is our space in the area, because one of  
12 the parking lots in south, the south side  
13 (inaudible) and which is that we use all the  
14 parking space, especially on Saturday and Sunday.  
15 Monday and Friday it wasn't that much, but we do  
16 have some visitors. We do have some literary and  
17 some reading taking place on Monday and Friday.  
18 It's not every day, but we do need that space.

↑ TR-19

19 However, if the traffic concerns, if you have a lot  
20 of trucks getting out of the space and some of our  
21 congregation will have limited space of getting in  
22 and out, but I'm not worried about all that. We  
23 also have a (inaudible) on the side we have two  
24 gates. One on the front and one on the back and we  
25 can use that as a drop-off point for our members.

↑ TR-19

1           But as far as the workflow, pretty often  
2           have what I see, some that the impact report that  
3           you'll be doing at almost at 2,000 -- more than  
4           2,000 truckloads of the dirt in and out of the  
5           area. So I wonder that (inaudible) should be  
6           tremendous effect. Not only our church as well,  
7           but also the neighborhood. The road should be  
8           quite a tremendous effect -- environmental concern,  
9           like the dirt, the air -- and the people -- that's  
10          a lot of people in and out of the area, things like  
11          that, that one also concerns.

GC-12

12          And I noticed that the staging area, I'm  
13          not sure quite what that means by the staging area.  
14          Are you using that to store all the equipment and  
15          things like that or are you using those parking  
16          spaces for parking?

GC-13

17          MR. JOHNSTON: Well, Mr. Wong, this is not  
18          really a question and answer, but we can answer  
19          those questions after the hearing.

20          MR. WONG: Oh okay, after the hearing,  
21          okay. Also, I wonder about this. We would like  
22          that if you do that, we would like to clear the  
23          parking lot using its stage from Saturday to  
24          Sunday; clearing out all of this because we need  
25          all the parking. So our congregation -- as far as

TR-19

1 you know, we have 80 parking spaces. But if you  
2 take that, you're taking a whole side; one-third of  
3 the parking space away. And we do need that back.  
4 So we need that to clear that area from Saturday to  
5 Sunday. Saturday, so for someone who's making just  
6 another holiday, but for us it's very aggravating.  
7 We have school, we have meetings and we have some  
8 athletic activity going on there. So Sunday and  
9 Saturday -- Sunday, it's often all day, so that's  
10 our concern. We need that area to clear for us to  
11 use it as well, okay?

12 And again, I do have something here to tell  
13 that someone attending already asked that question  
14 on that period in time. So that's my questions.

15 MR. JOHNSTON: Anybody else like to speak?  
16 Great, just raise your hand for the court reporter.  
17 Anthony Cheung, okay. Thank you.

18 MR. CHEUNG: My name is Anthony Cheung with  
19 the San Bruno Chinese Church here. I'm one of the  
20 deacons. I was just waiting to see what I need to  
21 add to his comments. The site that's been  
22 (inaudible). I see (inaudible) the two routing for  
23 the trucks. One of them is on the road which is  
24 fine with me and the second one is actually going  
25 through our parking lot. On the (inaudible)

↑ TR-19  
cont'd.

TR-19  
↓

1 parking lot, but that is the largest parking lot we  
2 have in our centers. So on Saturdays we have  
3 Chinese school, so there are little children  
4 running around many times here on the lawn, but  
5 there's a group of students, they play basketball  
6 on the parking lot. We use that parking lot as a  
7 basketball court. So Saturdays and Sundays, I  
8 would appreciate if you don't have overtime work,  
9 because maybe we'll have children running around on  
10 Sundays and Saturdays. Thank you.

11 MR. JOHNSTON: Thank you. Okay, anybody  
12 else? Going once, going twice. Okay. Well,  
13 again, we will be accepting your comments in  
14 writing up until the end of the comment period on  
15 April 29th. Skip the contact information up there,  
16 yeah.

17 So Steve Smith, he's your guy at the  
18 Planning Department for comments on the EIR or  
19 questions on the EIR. If you have questions or  
20 comments about the project you can contact Yin Lan  
21 Zhang at the SFPUC.

22 And then once again I want to remind  
23 everyone that you can view the EIR online. If you  
24 don't have a copy, we could get you a copy, we can  
25 get you a CD copy. If you haven't got the report

↑ TR-19  
cont'd.

1 yet, please do so. And then the last slide is just  
2 where to send your written comments and the  
3 important dates, e-mails, fax number. With that,  
4 we would like to close the hearing and we thank you  
5 for coming and for offering your comments.

6 So that was the formal part. The informal  
7 part, I want to say that I heard a lot of your  
8 concerns tonight, but I didn't hear a lot of  
9 comments on the adequacy of the EIR, so all -  
10 (inaudible) comments and there are separate  
11 sections for each of those topics in the EIR that  
12 we invite you to look at. And then let us know  
13 whether or not we covered those topics adequately  
14 for you. So that's kind of what we were here for  
15 tonight. Thank you again for coming.

16 MR. HUEY: The rest of us will be around so  
17 you can ask us questions. We have plenty of  
18 coffee.

19 (HEARING CONCLUDED)

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REPORTER'S CERTIFICATE

I, EASTELLER BRUIHL, CSR No. 3077, a California Certified Shorthand Court Reporter for Star Reporting Service, Inc., 505 Montgomery Street, Suite 1000, San Francisco, California 94111, do hereby certify:

That the foregoing proceedings were stenographically recorded at the time and place therein set forth, and that all discernibly audible comments, objections and statements made at the time of the proceedings were thereafter transcribed;

That the foregoing is a true and correct transcript to the best of my ability of the hearing proceedings.

I further certify that I am not a relative or employee of any attorney of the parties nor financially interested in the action.

I declare under penalty of perjury by the laws of the State of California that the foregoing is true and correct.

Dated: THURSDAY, APRIL 18, 2013

1

A handwritten signature in cursive script, appearing to read "Easteller Bruhl", is written over a horizontal line.

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Easteller Bruhl, RPR, CSR No. 3077



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BEFORE THE  
SAN FRANCISCO PLANNING COMMISSION

ITEM NO. 8 - 2011.0123E

SFPUC PENINSULA PIPELINES SEISMIC UPGRADE  
(PPSU) PROJECT

PUBLIC HEARING ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT

12:00 P.M.

Thursday, April 18, 2013

Commission Chambers - Room 400  
City Hall, 1 Dr. Carlton B. Goodlett Place  
San Francisco, California

REPORTED BY: DEBORAH FUQUA, CSR #12948

1 APPEARANCES:

2 SAN FRANCISCO PLANNING COMMISSION

3 President: RODNEY FONG

4 Vice President: CINDY WU

5 Commissioners: MICHAEL ANTONINI, GWYNETH BORDEN,  
6 RICH HILLIS, KATRIN MOORE and  
HISASHI SUGAYA

7 Acting Secretary: JONAS P. IONIN

8 Planning Commission Staff:

9 Steven Smith, Environmental Planner

10

11 Denise Heick, URS Corporation, Environmental Consultant

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13

14 PUBLIC COMMENT: - none this session -

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1 Thursday, April 18, 2013 2:03 o'clock p.m.

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3 P R O C E E D I N G S

4 PRESIDENT FONG: Next item, please.

5 SECRETARY: All right, Commissioners, I have 8,  
6 Case No. 2011.0123.E the SFPUC Peninsula Pipeline  
7 Seismic Upgrade Public Hearing on the Draft  
8 Environmental Impact Report.

9 Please note, an additional public meeting will  
10 be held on April -- excuse me -- was held on April  
11 16th. Written comments on the Draft EIR will be  
12 accepted at the Planning Department until 5:00 p.m. on  
13 April 29th, 2013.

14 STEVEN SMITH: Good afternoon President Fong,  
15 Members of the Commission. My name is Steven Smith  
16 from the Environmental Planning section of the Planning  
17 Department. I'm the EIR coordinator for the proposed  
18 Peninsula Pipeline Seismic Upgrade Project, which is  
19 sponsored by the San Francisco Public Utilities  
20 Commission.

21 This project is one of several that comprise  
22 the PUC's larger Water System Improvement Program, or  
23 WSIP.

24 This is a hearing to receive comments on the  
25 Draft Environmental Impact Report for Case

1 No. 2011.0123E, which assesses the Peninsula Pipeline  
2 Seismic Upgrade Project. This Draft EIR was published  
3 on March 13th, 2013 and delivered to you shortly  
4 thereafter.

5 Staff are not here today to answer comments.  
6 Comments will be transcribed and responded to in  
7 writing in a response to comments document which will  
8 address all verbal and written comments received and  
9 include revisions to the Draft EIR as appropriate.

10 This is not a hearing to consider approval or  
11 disapproval of the project. That hearing will be held  
12 by the SFPUC following certification of the Final EIR.  
13 Comments today should be directed to the adequacy and  
14 accuracy of information contained in the Draft EIR.

15 Commenters are asked to speak slowly and  
16 clearly so that the court reporter can produce an  
17 accurate transcript. Commenters should also state  
18 their name and address so that they can be properly  
19 identified and so that they can be sent a copy of the  
20 responses to comments document when completed.

21 After comment from the general public, I'll  
22 also take any comments on Draft EIR from the Planning  
23 Commission.

24 The public comment period for this project  
25 began on March 14th, 2013 and extends until 5:00 p.m.

1 on Monday, April 29th, 2013.

2 As noted, one local Draft EIR hearing was held  
3 previously in the nearby project vicinity. This was on  
4 Tuesday, April 16th, 2013 in San Bruno.

5 I would note that staff are here today. If  
6 the Commission is interested, at your request, a brief  
7 overview of the project could be presented.

8 Otherwise, we could move along to the formal  
9 hearing.

10 PRESIDENT FONG: You can move along. Thank you,  
11 though.

12 STEVEN SMITH: With that, I'll recommend that the  
13 public hearing be opened.

14 PRESIDENT FONG: Opening it up for public comment  
15 on this item.

16 (No response)

17 PRESIDENT FONG: Seeing none, public comment is  
18 closed.

19 Commissioners, any questions?

20 Commissioner Antonini?

21 COMMISSIONER ANTONINI: Yeah, I just wanted to  
22 mention that we -- this has been somewhat segmental.  
23 Obviously we have different parts of the system that  
24 are dealt with.

25 It seemed to me we did do a pipe replacement

GC-14



1 about two years ago in the area of Ralston Boulevard in  
2 Belmont. And this is another -- maybe this is a little  
3 further north. I'm just not sure why this area is  
4 being dealt with separately from that one. Maybe it's  
5 geographical.

6 STEVEN SMITH: If I could defer to the PUC project  
7 manager to respond to this item, just for  
8 clarification? I don't see that as an environmental  
9 impact question per se.

10 COMMISSIONER ANTONINI: No, it's not really. It's  
11 just a project question.

12 STEVEN SMITH: If you're interested, I could have  
13 somebody from PUC respond to that, clarify.

14 COMMISSIONER ANTONINI: Maybe clarification would  
15 probably be okay if we can do that. Maybe it should  
16 come in comments and responses.

17 STEVEN SMITH: That's fine.

18 COMMISSIONER ANTONINI: You know, just clarify the  
19 segments of the plan. And it's been very well done.  
20 You know, we've had a lot of different parts. Just  
21 verify that this is -- you know, there may be one  
22 coming up in the future for another area.

23 STEVEN SMITH: Understood.

24 COMMISSIONER ANTONINI: Okay. Thank you.

25 PRESIDENT FONG: Any other questions, comments?

1 (No response)

2 PRESIDENT FONG: Okay, thank you.

3 Jonas, the Commission will take a short break  
4 now. Thank you.

5 (Whereupon, the proceedings concluded  
6 at 2:07 o'clock p.m.)

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1 STATE OF CALIFORNIA )  
2 COUNTY OF MARIN ) ss.

3 I, DEBORAH FUQUA, a Certified Shorthand  
4 Reporter of the State of California, duly authorized to  
5 administer oaths pursuant to Section 8211 of the  
6 California Code of Civil Procedure, do hereby certify  
7 that the foregoing proceedings were reported by me, a  
8 disinterested person, and thereafter transcribed under  
9 my direction into typewriting and is a true and correct  
10 transcription of said proceedings.

11 I further certify that I am not of counsel or  
12 attorney for either or any of the parties in the  
13 foregoing proceeding and caption named, nor in any way  
14 interested in the outcome of the cause named in said  
15 caption.

16 Dated the 2nd day of May, 2013.

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DEBORAH FUQUA  
CSR NO. 12948